

Name: Group Discussion

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Name of Reviewers: T. Wright Dickenson, Dean Gent, Maryanna Raftopoulos, Jeff Comstock, Ron DellaCroce, Tom Gray, Beverly Rave

Also sent for review to Brad Petch who could not attend the group discussion and Shane Henry, Department of Natural Resources

Phone number: See NWCOS membership list

Email address: See NWCOS membership list

I. We have a concern with the following sections:

Topic: All are included

Page number: Various reflected in attached Alternative Spreadsheet

II. Our concern is:

There seems to be some significant changes between the 6/1/05 and 6/27/05 version of the draft that does not reflect all of the comments submitted. In some cases, which we will attempt to address as we proceed, Alternative A, which is the “No Action” Alternative has been modified and no longer is consistent with the existing RMP.

Another big concern is the prescriptive language in some of the topics and not only the lack of, but the removal of that same level of prescriptive language in other topics where the 6/1/05 draft stated these were land use decisions not RMP decisions. Either these new prescriptive Alternatives need to be removed from the next draft or all topics need to be developed to that level. The prescriptive language in this draft will also be identified in our comments and if they are to be included we want to be sure time is provided to create the same level of definition for the other topics. We would certainly prefer the RMP be as broad as possible to allow for maximum flexibility rather than being so specific there is no room for adaptive management or cooperative conservation options.

Page 12 through 16- Alternative A is not from the existing RMP or have been modified and therefore not the “No Action” Alternative. Re-state Alternatives from 6/1/05 Draft as shown on the attached spreadsheet. If the Alternatives in this draft are to remain they should be moved to Alternative D (most restrictive) and new alternatives should be developed for B and C. These are prescriptive and should be land use plan decisions not RMP decisions. Alternative B should consistently state, “Adhere to wildlife standards.” Alternative C should apply adaptive management practices and implement cooperative conservation to manage across the landscape.

p. 18 through 41 not an adequate range of alternatives, remove species specific recommendations. This level of detail does not belong at the RMP level, these are land use decisions. Discuss the general protection of all species as it appeared in the 6/1/05 draft. The Yampa River Endangered Fish Recovery Plan Should be used as guidance for the endangered fish, not the stips proposed in the alternatives. Where ever a cooperative management plan has been developed it should be stated in Alternative C as the preferred alternative to apply the adaptive management practices and implement cooperative conservation. . If the alternatives in this draft are included they should be moved to Alternative D and new alternatives for B and C developed to set consistent goal posts and create a middle ground alternative. In most cases Alternative B could say, “Adhere to Standards and Guidelines”.

Page 46 Livestock. Goal B No. 1 should read “Allow the opportunity to create common reserve allotments on existing federal lands, by partnering with state, federal, or private landowners with the ultimate goal of improving individual allotments and the landscape to sustain flexible and viable ag operations in such a way that the reserve common allotment is ultimately returned to permittees and will not impact private or state land inholdings.” This Objective should in no way provide an opportunity for BLM to take any allotments out of livestock grazing or to acquire private land to include in the common reserve allotments.

All the specific sites discussed in broad terms with the more prescriptive alternatives being land use plan decisions, not RMP decisions. If these are included the same preference should be awarded all topics. Some of the language in Alternative A is not in the existing RMP and should be moved to Alternative D if they are left in this document.

Page 59 Lands With Wilderness Character Outside Existing WSAs

p. 59-61 Vermillion , Dino North, Cold Springs Mt., and Little Yampa Canyon CWP all need to have good range of alternatives. Alternative A should show, “No similar action” since they are not in the existing RMP. This Alternative should be included in Alternative D. Alternative B should show none of the sites have wilderness character and should have no special designations. Alternative C should include, “Apply adaptive management practices and implement cooperative conservation policy to manage across the landscape and to ensure there is no impact to state and private land inholdings or to split estate minerals interests and access to all these properties.

Page 69 Minerals and Energy

Make sure that Alternative A is the “No Action” Alternative from the existing RMP. If it is not in the existing RMP is should be deleted or moved to Alternative C or D depending on how restrictive they are. Some of the Alternatives may be land use plan decisions and beyond the scope of this RMP. Including Alternatives that are too prescriptive limits flexibility and is inconsistent with some other topics that are not as detailed. Language in these alternatives is not consistent with the alternatives in other topics such as Special Status Species. There should be a cross reference to the other topics where applicable to facilitate a better understanding of alternatives.

Page 92. Recreation

First Goal, Objective 1, should read, “Increase managed mortoized and non-motorized land and water use”.

Objective 2. We request BLM follow NWCOS's direction and delete "in backcountry areas" as agreed upon in the 6-1-2005 Alternatives Document.

NWCOS also suggested alternative 7 "Identify thresholds at which management actions may be changed to ensure quality recreational activities." This was not incorporated, and we request it be done.

Page 92 . Recreation the second goal. NWCOS recommended in the 6-1-2005 document that "...compatible with sustainable land management objectives" be added to the end of the goal. This was not done.

Page 92 NWCOS suggested a new objective under the second goal be added (1. identify interpretive and educational strategies to protect resources." This was not incorporated. Add an additional objective under second goal that reads, "Preserve a quality recreation experience consistent with the capability of the use area".

Page 92 objective 1 under the third goal. We request that "...compatible with sustainable land management objectives" be included as per NWCOS request.

Third goal objective 2, add after, "...organizations such as, Moffat and Routt Counties, Chambers..."

Page 93 Under Little Yampa/Juniper Canyon A, Alternative C, delete "flatwater river floatboating" and add, "motorized and non-motorized boating"

Page 93 B, The current Alternative C should be moved to B, D should restrict use and the new Alternative C No. 1 should read, "Establish dispersed but developed river-related campsites". No. 2, "Establish dispersed but developed camping facilities in high impact areas for hunting season uses". No. 3 leave as is, delete No. 4 and just refer to the Minerals and Energy section, No. 5 leave as is, will reconsider Nos. 6 and 7 after they are developed. Should not be specific to areas, but rather types of use. If you are going to create specific areas it has to be across the board for grazing, oil and gas, etc. Identify how they will work with other users.

III. Our recommendation for improvement is:

Included in the Comments

(Facilitator Suggestion: Please provide specific language for BLM to consider incorporating into the RMP. It is significantly less helpful to receive comments that say things like: "BLM should incorporate more adaptive management ideas into Alternative C.")

MEMORANDUM

June 28, 20045

Re: Comments and Recommendations on June 27, 2005 Draft BLM Alternatives

TO: NWCOS

FROM: GROUP DISCUSSION

T. Wright Dickenson
Dean Gent
Jeff Comstock
Maryanna Raftopoulos
Ron DellaCroce
Tom Gray
Beverly Rave

Comments have also been submitted for review by Brad Petch, who could not make our group discussion meeting, and Shane Henry, Department of Natural Resources.

As cooperating agencies, some of the participants in this review will also be submitting agency comments directly to BLM. This effort is intended to fulfill the review requirement agreed to by NWCOS and to implement discussion at the NWCOS level of issues and concerns viewed as "Hot Topics".

General Comments:

There seems to be some significant changes between the 6/1/05 and 6/27/05 version of the draft that does not reflect all of the comments submitted. In some cases, which will be reflected as we proceed, Alternative A, which is the "No Action" Alternative has been modified and no longer is consistent with the existing RMP. There is a table comparing the two documents and the changes.

BLM listed as a "Hot Topic" the development of the Adaptive Management Alternative C concept. In many cases there were comments submitted following the 6/1/05 draft that would get to that Adaptive Management Alternative as discussed at most meetings and included the "Cooperative Conservation" interest re-stated by Kathleen Clark. There is very little evidence that those comments were considered or included in the 6/27/05 draft. We will make sure they are re-iterated in this response.

You will find attached a comment sheet for issues we felt were "Hot Topics" that are over and above the ones listed by BLM. All of our additional hot topics are on one comment sheet and identified by topic or page number.

We also found many cases where the most restrictive Alternative was stated in B rather than D and Alternative C was left open. We will attempt to re-align those areas for consistency and provide recommendations for C.

Another big concern is the prescriptive language in some of the topics and not only the lack of, but the removal of that same level of prescriptive language in other topics where the 6/1/05 draft stated these were land use decisions not RMP decisions. Either these new prescriptive Alternatives need to be removed from the next draft or all topics need to be developed to that level. The prescriptive language in this draft will also be identified in our comments and if they are to be included we want to be sure time is provided to create the same level of definition for the other topics. We would certainly prefer the RMP be as broad as possible to allow for maximum flexibility rather than being so specific there is no room for adaptive management or cooperative conservation options. The more prescriptive language and decisions would be developed in the subsequent Activity Plans.

There is a lot of inconsistency between topics. For example, the distance required away from a grouse lek is different in the Wildlife section than it is in the Minerals and Energy section. There should be a cross-reference anytime the same species or activity is included in a different topic and the inconsistencies corrected or explained, if in fact, they are different.

Please let us know if there are questions or if something in this submission is unclear.

6/27/05 Draft Alternative Comments

Soil Resources

Page 1 What is meant by “Chemical degradation” in Objective 2?

Page 1A Alternative B should read, “Adhere to the Soil Standards”, Alternative C could read, “Apply adaptive management practices and implement the Cooperative Conservation policy. Allowing disturbance is predicated on preserving and improving site integrity.”

Page 2 B Alternative B should read, “Adhere to Soil Standards”, Alternative C could read, “Apply adaptive management practices and implement the Cooperative Conservation policy. Allowing disturbance is predicated on preserving and improving site integrity.”

Page 2 C Alternative B should read, “Adhere to Soil Standards”, Alternative C could read, “Apply adaptive management practices and implement the Cooperative Conservation policy. Allowing disturbance is predicated on preserving and improving site integrity”. Alternative D should read, “Permit no oil and gas leases or surface disturbing activities.”

Water Resources

Page 5, Goal B, Objective 2 Add at the end of the statement, “...hydrology implementing cooperative conservation policy to include across boundary management on state and private land whenever possible.”

Page 5,B Water Resources section needs a range of alternatives, from NSO in Alternative D to full occupancy in Alternative B and an Alternative C with an adaptive approach. Adaptive approach would be to demonstrate that if activity does not affect water source, activity can occur any distance from water source.

Vegetation-Overall

Page 6 Overall Objectives No. 4, Add after prescribed fire, “chemical and biological...”

Sagebrush Goal A Objectives add a No. 4 “Apply adaptive management principles and implement cooperative conservation policy to manage sagebrush communities across the landscape.

Sagebrush Goal B Objectives, No. 4 –change quantity to quality. If the quality is poor the quantity will not be beneficial or at least not as beneficial as it could be.

Page 7 Riparian and Wetlands Goal A No. 1. Delete “human caused”. Provide a definition of “acceptable parameters”. By what standard will these be measured?
Add a No. 4. “Apply adaptive management principles and implement cooperative conservation policy by working with adjacent landowners and other resource users to create management opportunities.

Riparian and Wetlands Goal B, No. 3, Add after "...work with" "adjacent landowners and"

Page 7 A, Alternative B should read, " Adhere to Standard 3",

Page 9 Forests and Woodlands C and D, Alternative C add, "an average of" after Restore and Treat. This will allow some flexibility if the need arises to restore or treat more of less than the acres stated.

Noxious Weeds G, Alternative C 2-Add "adjacent landowners" after "Partner with..."

Fish and Wildlife Habitat

Page 11 Goal D add at the end, "adjacent landowners and resource users
Goal E-Change to, "Reduce manageable forms of wildlife disturbance.

Goal B Objective No. 4, Change quantity to quality

Goal C Objective no. 4 delete everything after "...big game populations" unless a similar statement is added to all other associated topics.

Goal D Objectives, Add a new No. 3. "Implement cooperative conservation policy by working with other agencies, adjacent landowners and resource users to manage wildlife across the landscape

Page 12 through 16- Alternative A is not from the existing RMP or have been modified and therefore not the "No Action" Alternative. Re-state Alternatives from 6/1/05 Draft as shown on the attached spreadsheet. If the Alternatives in this draft are to remain they should be moved to Alternative D (most restrictive) and new alternatives should be developed for B and C. These are prescriptive and should be land use plan decisions not RMP decisions. Alternative B should consistently state, "Adhere to wildlife standards." Alternative C should apply adaptive management practices and implement cooperative conservation to manage across the landscape.

If the Grouse prescription is included it needs to be the same as state in Minerals and Energy on page 70. They are not consistent.

There should also be an Alternative in the Wildlife Section that mirrors B in the Livestock Section that discusses wildlife numbers in the same allotments. See existing RMP page 12, No. 2. under Wildlife Habitat.

Special Status Species

Page 18 through 41 not an adequate range of alternatives, remove species specific recommendations. This level of detail does not belong at the RMP level, these are land use decisions. Discuss the general protection of all species as it appeared in the 6/1/05 draft. The

Yampa River Endangered Fish Recovery Plan Should be used as guidance for the endangered fish, not the steps proposed in the alternatives. Where ever a cooperative management plan has been developed it should be stated in Alternative C as the preferred alternative to follow. If the alternatives in this draft are included they should be moved to Alternative D and new alternatives for B and C developed to set consistent goal posts and create a middle ground alternative. In most cases Alternative B could say, “Adhere to Standards and Guidelines”

Pages 33-36 remove specific references to candidate plants and propose a general protection strategy for them. Expand options to include adaptive management rather than all the Alt A steps.

Wild Horses

Page 42 Objectives No. 2, add at the end, “and resource users”. No. 3 should read, “...and other resource users as conflicts occur.” Add a new No. 4, “Implement cooperative conservation to ensure cooperative use of the resources and maintain a viable level of livestock use.”

Alternative C at the end of No. 1 add, “ to ensure there are no impacts to adjacent state and private lands. No. 2, add land health standards as letter g.

Fire

Page 44 There is no range to compare in the fire discussion. Should consider full suppression to no suppression in fire management options. Move what is currently in Alternative B to C and make D no suppression across the board unless there is a threat to life and property. Alternative B should be complete suppression across the board. Alternative C should also include, “Apply adaptive management practices and implement cooperative conservation to manage fire both natural and prescribed across the landscape. Follow the established Fire Management Plan”.

B Alternative B Should not be limited by Class I airsheds. The limited factors should be in Alternative D.

Livestock

The goals and objectives need to show more similarity to wildlife.

Page 46 Livestock. Goal B No. 1 should read “Allow the opportunity to create common reserve allotments on existing federal lands, by partnering with state, federal, or private landowners with the ultimate goal of improving individual allotments and the landscape to sustain flexible and viable ag operations in such a way that the reserve common allotment is ultimately returned to permittees and will not impact private or state land inholdings.”

Goal B No. 2 should read, “Identify land not available for livestock grazing, but only where private and state land inholdings will not be impacted.”

Alternatives

B, Alternative B should read, “Work closely with CDOW and other resource users to reduce livestock/big game conflicts by including a reduction in big game numbers to improve vegetative and forage conditions without reducing grazing numbers for livestock.

Page 47 E, Alternative B should read, “Establish common reserve allotments on existing federal land, in cooperation with state, federal and private landowners, to allow use within those allotments when the following criteria are met:

Will review bullets with next iteration.

There are a lot of alternatives missing that are in the existing RMP. They should be included if the prescriptive alternatives in other topics are included.

Special Management Areas

Page 49 Goal should include at the end, “implementing cooperative conservation so there is no impact to adjacent state and private lands, valid existing rights, and split estate mineral interests.”

Objectives No. 2, needs to include at the end, “where no impact or involuntary inclusion of state and private lands will occur.”

No. 4 Should read, “ In collaboration with local, county, state and other resource users, complete motorized route designations for special areas that are not closed to motorized vehicle use.

Areas of Critical Environmental Concern

Page 49 Alternative C-first sentence should read, “Retain designation of the Irish Canyon ACEC (11,680 acres, with the exception of state and private land inholdings and any split estate mineral acres, including providing access to those inholdings.

Page 50. F. Add in Alternative B “and in coordination with cooperating agencies” rather than simply referring to “other interested agencies” and delete “BLM would retain sole management responsibility” to provide for application of adaptive management practices and implementation of cooperative conservation across the landscape. Alternative C make same as Alternative B.

All the specific sites discussed in broad terms with the more prescriptive alternatives being land use plan decisions, not RMP decisions. If these are included the same preference should be awarded all topics. Some of the language in Alternative A is not in the existing RMP and should be moved to Alternative D if they are left in this document.

Limestone Ridge

Page 50If Alternative A is not in existing RMP move it to C. Delete “except closed to other minerals” in Alt C. This helps get a wider range of alternatives since Alt D is closed to other minerals.

Add adaptive option in Alt C (refer to appendix “X”)

page 51 Irish Canyon,
Move Alternative A to D

Add adaptive option of appendix “x” to alternative C.

Page 51 Lookout Mountain.

Move Alternative A to C since the current C is not the adaptive alternative, it to closely mirrors D.

Remove “no new communications sites will be authorized”. There is nothing wrong with adding more towers to the only practical tower location in the area. Do not prevent mineral, coal, or locatables, allow them to occur based on “appendix X”

Page 52 Remove ROW exclusion area from Alt B as it is in Alt C.

Page 52 Cross Mountain

Move Alternative A to C except not VRM Class I and put that in Alternative D.

Page 53 White Tailed Prairie Dog Comments.

See Julander Energy Comments posted on NWCOS web page. Also no range exists between alternatives. This must be included, just as it is for other ex-ACEC areas, or not included since it should be a land use plan decision not an RMP decision.

Page 53 Wilderness Study Areas

These are prescriptive/should be land use plan decisions not RMP decisions

Page 55 West Cold Springs and Vale of Tears North, What has changed since the evaluation in 1991 to indicate these should be managed for wilderness characteristics?

For AA and BB. The range of alternatives is not broad enough. Alternative A should be whatever language is in the existing RMP. Alternative A should be moved to C and include implement cooperative conservation policy to manage across the landscape or ensure no impact to state and private land inholdings and split estate mineral interests. Alternative B as it now exists should be moved to Alternative D and B should state no new designations or management prescriptions for wilderness values.

Page 56 Delete CC since there are state minerals within some of these areas that may be leased. This is another reason for some of these areas not being eligible for CWP consideration.

Page 58 Wild and Scenic Rivers

Alternative A-Should show “No similar action”, since this is not in the existing RMP. The language in this alternative should be included in Alternative D, if at all.

Page 59 Lands With Wilderness Character Outside Existing WSAs

Page 59-61 A question has been raised, regarding the fact that the CWPs were not acknowledged in the 6/1/05 draft and were extensively acknowledged in the 6/27/05 draft. If they are included they should be in very broad alternatives with maximum flexibility to collaboratively complete the evaluations as land use plans and Alternative B and at least in most cases, the other existing uses in and under those areas needs to be acknowledged.

Vermillion , Dino North, Cold Springs Mt., and Little Yampa Canyon CWP all need to have good range of alternatives. Alternative A should show, “No similar action” since they are not in

the existing RMP. This Alternative should be included in Alternative D. Alternative B should show none of the sites have wilderness Character and should have no special designations. Alternative C should include, “Apply adaptive management practices and implement cooperative conservation policy to manage across the landscape and to ensure there is no impact to other resource uses on and under the lands, state and private land inholdings or to split estate minerals interests and reasonable access to all these properties.

VRM’s

Page 62 Defer Comment on VRM’s until table is complete and detailed discussion about VRM’s occur with NWCOS and/or Cooperating Agencies. Alternative A should show, “No similar action” since these are not included in the existing RMP.

Cultural and Paleontological

Page 63 Cultural Resources. Add within Support Goal A to “Fully consult with local governments according to section 106 of the National Historic Preservation Act.” Add a Goal C under Cultural Resource Program Goals, that states, “Implement cooperative conservation practices to work with state and private landowners to protect sites that are not on BLM land, while protecting the private property rights of those landowners.

Under Program Objectives No. 1, after cultural resources, insert, “on BLM land..” No. 2 after cultural studies, insert, “on BLM land in a manner that will not cause impact or impose trespass to sites on state and private land..”

Under Support Goal A #2 add “tribal and Local Governments” to streamline consultation procedures. Under Support Goal A#3 add “Cooperate with local and tribal governments to assign use allocations for appropriate cultural properties.” Support Goal B, add “Develop predictive modeling to assist in ground truthing efforts to determining areas that can be released from archeological stipulations.”

Page 64 C, Alt A, Currently this proposal is one of avoidance, therefore it needs to be modified in Alternative C, to allow for the Arch. resource to be released, relocated, or determined not significant. Alternative C needs to stipulate on BLM land, unless cooperative conservation practices have produced agreements for surveys on state and private lands.

Page 64 D, Alternative C needs to stipulate on BLM land, unless cooperative conservation practices have produced agreements for surveys on state and private lands.

Page 65 Interpretive sites #2 alt B. How likely is acquisition of Vermillion Canyon???? Maybe use wording more accurate such as “partner with the State land board too...” or say, “If an exchange can be completed...” Alternative C should stipulate on BLM land, unless cooperative conservation practices have produced agreements for surveys on state and private lands.

Page 67 Paleontological Resources.

At the end of Objective 1 add "...and modeling". The range of alternatives is not well covered. Alt B needs to encourage mitigation, while Alt D should promote avoidance of sites, and Alt C needs to include implementation of cooperative conservation practices to work with state and private landowners to protect sites that are not on BLM land, while protecting the private property rights of those landowners.

Minerals and Energy

Page 69 Objectives-Add a No. 4, Provide access to state and private mineral interests included split estate ownership implementing Best Management Practices and sound stewardship standards for access roads.

Make sure that Alternative A is the "No Action" Alternative from the existing RMP. If it is not in the existing RMP it should be deleted or moved to Alternative C or D depending on how restrictive they are. Some of the Alternatives may be land use plan decisions and beyond the scope of this RMP. Including Alternatives that are too prescriptive limits flexibility and is inconsistent with some other topics that are not as detailed. Language in these alternatives is not consistent with the alternatives in other topics such as Special Status Species. There should be a cross reference to the other topics where applicable to facilitate a better understanding of alternatives.

Page 69 Alternative C Re-insert a provision for providing access to state and private mineral interests.

page 76. Sage Grouse Stips. Alt C is more restrictive than Alt D. They should be reversed. Listing Hours of the Day and 4 mile radius' is overly prescriptive given the lack of science available to defend these restrictions. We recommend these restrictions occur in Alt D and a completely adaptable technique be described in Alt C. Such as, drill if you demonstrate reasonable actions to not hinder grouse.

Page 79 Alternative C should read, " Allow development where potential exists that can occur in such a manner to preserve the existing characteristics. Remove the Zone 1 and 2 portions.

Page 80 Add an adaptive approach to Alt C that would be described in Appendix X, and include implementation of cooperative conservation policy in working with adjacent state and private landowners in the development of mineral interests. The existing Alternative C is already included in D. Alternative B should state, "All development should adhere to Range Land Health Standards.

Page 80. Uranium is not mentioned and could easily be an issue in the LSFO immediately, as Standard Uranium has staked approximately 1 ½ townships in Moffat County to date.

Page 83 Coal and Oil Shale

Objectives No. 3 add at the end, "and work to provide access for development of state and private mineral interests.

Page 84 NSO under E. is in direct conflict with Page 50 Limestone Ridge ACEC which is open under Alt A. Alternative A is also not in the existing RMP so at least should be moved to Alternative D. Alternative B should be included in D. Alternative B should read, "All development should adhere to Range Land Health Standards. Alternative C should " Allow development where potential exists that can occur in such a manner to preserve the existing characteristics and adhere to Range Land Health Standards.

Transportation

Page. 86. Goal A, change to read, "Provide a transportation system that is manageable and maintainable, meets management needs of the BLM, local and state governments, and private landowners, and minimizes impacts to resources and habitats.

Goal A, Objective 1, change the word "minimize" to 'manage". Under objective 1a, Change "local governments" to "County Government" and separate Counties as a separate authority than key participants or affected interests. Moffat County has specific legal authorities over roads and transportation planning that affected interests don't. This is the exact same comparison as DOW having specific legal authorities over wildlife that cooperators and affected interests don't.

Page 86 Objective 1 under Goal B. Change "local governments" to "County Governments".

Page 86 Travel management, Goal, change to read, "Provide for types or modes of access and travel that will balance resource protection with use". Objective 1 Change "local government" to 'County Government'. Objective 2. behind the word 'limited', add "... with adaptive management options,...". Objective 4, change to read, "Implement cooperative conservation to identify a managed road, route and trail system within the planning area".

Page 87 Under Transportation and Access, add an additional bullet in Alternative C that reads, "Does not impact access to state and private lands an split estate mineral interests".

Travel Management. Under Alt. C add an adaptive approach to limited rather than various mapped areas of use as referred to in Appendix X. Alternative B should say open and Alternative D should say closed.

Page 88

Limited to Designated Road and Trails Alt C. Browns Park Cellular site was TEMPORARILY closed in 2004 on a collaborative agreement between the County Commissioners, County Sheriff's Office, the grazing tenant, and BLM to prevent possible arch. damage. The agreement was to reopen OHV travel should an arc clearance be obtained. We request this site be referred in such a way. Closure is unacceptable as per the terms of our agreement and the 2004 site tour. Also in Alternative C add a bullet that includes, "State and private lands."

Page 89 Under Adaptive Limited OHV Designations H, Alternative C, change No. 1 to read, Implementing cooperative conservation, set criteria to determine priorities for area transportation planning".

Recreation

Pages 92 to 102-Significant changes were made between the 6/1/05 draft and the 6/27/05 draft, in many cases omitting the redline changes in the 6/1 document. The 6/27 document should be corrected to incorporate those recommended corrections and Alternatives and then be re-submitted for comments.

Page 92. first Goal, Objective 1, should read, “Increase managed motorized and non-motorized land and water use”.

Objective 2. We request BLM follow NWCOS’s direction and delete “in backcountry areas” as agreed upon in the 6-1-2005 Alternatives Document.

NWCOS also suggested alternative 7 “Identify thresholds at which management actions may be changed to ensure quality recreational activities.” This was not incorporated, and we request it be done.

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Page 92 objective 1 under the third goal. We request that “...compatible with sustainable land management objectives” be included as per NWCOS request.

Third goal objective 2, add after, “...organizations such as, Moffat and Routt Counties, Chambers...”.

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Page 93 B, The current Alternative C should be moved to B, D should restrict use and the new Alternative C No. 1 should read, “Establish dispersed but developed river-related campsites”. No. 2, “Establish dispersed but developed camping facilities in high impact areas for hunting season uses”. No. 3 leave as is, delete No. 4 and just refer to the Minerals and Energy section, No. 5 leave as is, will reconsider Nos. 6 and 7 after they are developed. Should not be specific to areas, but rather types of use. If you are going to create specific areas it has to be across the board for grazing, oil and gas, etc. Identify how they will work with other users.

Page 96 Coal and Locatable Minerals are closed in Alt C for South Sandwash SRMA. We suggest an adaptive approach suggest how to allow locatables and coal while still providing a quality recreation experience.

Page 97 Flycreek-The access to this area across private land is covered in a Conservation Easement. The area should be managed in accordance with the language in that easement.

Page 98 Dinosaur North Area-Alternative C No. 2, add an additional bullet that reads, “except for state owned split estate minerals all of which are open for development, and access to those minerals will allowed with appropriate reclamation requirements.

Page 99 Cold Springs Area, The largest portion of the top of the mountain is private and state owned and legal access is limited to the County Road and BLM ROWs across state land to the north near Middle Mountain.

Lands and Reality

Page 103 Goal C at the top of the page. under the examples of ROW routes, add “transportation routes”

Goal C, No. 4, change to read, “Implement cooperative conservation in identifying and establishing major utility and transportation corridors with the planning area by working with local, state and federal government agencies and private landowners to ensure reasonable access across the landscape.

Page 104 Alt B third bullet point from top, add Parcels more suitable for management by another federal, State, “OR LOCAL” agency.

Page 105 D. Alt B. add “Willing Seller, Willing Buyer” as a criteria for acquisition.

Page 105 ROW. Add a letter between E and F to state “ Access Rights-of-Way have been asserted by Moffat County and will be acknowledged at such time secretarial or Congressional direction so allow.” This should be consistent throughout all 4 alternatives.

Page 106 I, Alternative B and C, include, “except where access to state and private lands and split mineral estates would be impacted.

Page 106 J, Alternative B and C include, “except where access to state and private lands and split mineral estates would be impacted.

Page 107, Renewable Energy, M, Alternative A is not in the existing RMP, it should read, “No similar action”. Include the current language in B, Add in Alternative C at the end, “and visual or resource impacts to state and private lands.

Page 108, N, Alternative A should read, “No similar action”. Move language to Alternative B and change C and D to the same as B.

Comparison between 6-1 and 6-27, 2005 BLM ALTERNATIVES DOCUMENTS

6-1-2005 Alternatives	6-27-2005 Alternatives
p.5-8 deleted many soil stips that were not RMP decisions	Still deleted in this document
p. 9 NWCOS suggested goal and objective changes	p.6-7 goal objective changes made
p. 10. Alternative C 10% was deleted. Lots of other changes to veg alternatives made.	P. 7.10% was added back. All veg alternative changes were incorporated.
p. 15-22 talked of grouse , raptors, big game “X”s were listed in document	p. 11-17 grouse, peregrine, ferruginous, osprey sandhill all adaptive options. “X”s were replaced with actual numbers.
p. 22-26 no specific species listed for federally threatened and endangered, simply stated need to protect them	p. 18-42 stips on white tailed p.dogs. BFF, fish stips are significantly more detailed than 6-1-05. Need to use Yampa River Endangered Fish Recovery Plan not stips in RMP; Mexican Spotted Owl, Yellow Billed Cuckoo, Mountain Plover, Cutthroat Trout, Boreal Toad, Bald Eagle were all added
p.22-23 Generally protects fed and state listed plants and candidate plants	p.34 lists them by species and states translocation is not an option for mitigation. OHV restrictions are proposed, lists several plants including Slender moonwort, DeBeque phacelia and Penland mustard.. Changes must add adaptive options and delete specific stips by species.
p. 37 ACEC’s, proposed all ACEC’s except White-tailed Prairie-dog	p. 49 added White-tailed p.dog as alternative D and Limestone ridge, Lookout Mt. and Cross Mt ACEC’s were removed in Alt C.
p.38 G. ACECs would be managed through avoidance stips in general.	p. 50-53 listed stips under each alternative for each existing ACEC. However the Lookout Mountain Stips say no new towers and is listed as NSO area including locatables, coal, oil gas. Lookout also has a ROW exclusion area.
p. 40 says all WSA’s, if released, would go to Multiple Use, SRMA, or primitive to simi-primitive motorized; and non motorized primitive in other areas.	p. 54 says it would be managed according to IMP BLM H8550-1 or other congressional direction.
p. 45 no mention of CWP’s	p. 59-61 CWPs except Vermillion, proposed to close to all minerals and limited OHV and Yampa Canyon within SRMA has proposed regs.
p. 46 VRM table incomplete	p. 62 VRM table incomplete

p. 47-50 cultural Resources hasn't been reviewed by NWCOS or cooperators. BLM's first Draft.	p. 63-66 Cultural resources same as 6-1-2005 version.
p 51-52 Paleontological Resources hasn't been reviewed by NWCOS or cooperators. BLMs 1 st draft.	p. 67-68 Paleontological Resources same as 6-1-2005 version.
p. 53 -58 Oil and Gas. Goals and objectives had NWCOS suggested changes. Stipulations were not specifically listed. Suggestions for Winter Drilling, seismic testing, small footprint areas, certain rig #'s at once, came from NWCOS. Outcome based process was suggested.	p. 69-79. Oil and Gas. Goal suggestions were followed. Stipulations are specifically listed under categories of Closed, NSO, Controlled Surface Occupancy, Timing Stips, and Open. Several TBD labels without a mention of year around drilling. Several of Timing stips with Appendix X suggestions are part of the Alternatives..
p. 59-62 Locatable Minerals has not been reviewed by NWCOS	80-82 Locatable Minerals same as 6-1-2005
p. 63-65 Coal and Oil Shale has not been reviewed by NWCOS.	83-85 Coal and Oil Shale same as 6-1-2005
P. 66-72 Transportation. No emphasis on specific areas for management	p. 86-91: Categories were established for Closed, Limited Designated trails, Limited Existing Trails, Open, and Adaptive Techniques.. Each category lists specific areas of the County.
p. 67 C. states a travel plan will be implemented in 1 year.	p.87 C. Travel Management Section. States the same but refers to various maps where the SRMA areas will be open closed or limited.
p.72-80 Recreation no specific areas were listed as proposed SRMA's p. 73 objectives were suggested by NWCOS p. 76 SRMA's would be dealt with by area	p.91-102 Recreation. Several areas were proposed as SRMA. Little Yampa/ Juniper Canyon, Cedar Mt, South Sand Wash, Serviceberry, Flycreek Dinosaur North, Cold Springs. Generally a good range of alternatives were considered, but Alt C is more on the preservation side then production side. p. 92. BLM did not incorporate NWCOS comments in the goals and objectives for Recreation. Backcountry was added to objective 2 and objective 7 from NWCOS was not incorporated (thresholds). The last part of the second goal was not incorporated (special designations must be sustainable with land practices). Objective 1 of the second goal was not incorporated despite NWCOS suggestion. NWCOS suggested the third goal end in ..."compatible and sustainable land management objectives" this was not

	<p>incorporated.</p> <p>p. 94 SRMA's are being dealt with by area</p> <p>p. 95 Alt C and Alt D have included avoidance and exclusion areas for ROW's.</p> <p>p. 96 Alt C. Coal and locatable is closed for south Sandwash SRMA, rest of minerals are open</p>
<p>p.81-85Lands and Reality NWCOS did not review</p>	<p>P103-108 Lands and Reality Same as 6-1-2005 version</p>