

# NWCOS COMMENT FORM FOR JUNE 27 DRAFT ALTERNATIVES

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Name of Reviewer: \_\_\_\_\_

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## I. We have a concern with the following section:

Topic: Special Management Areas \_\_\_\_\_

Page number: 49 \_\_\_\_\_

## II. Our concern is:

ACEC status, properly applied, could enhance BLM's ability to manage (adaptively or otherwise) for site-specific values. However, this document treats ACEC as an impediment to adaptive management in Alt C. To accomplish this, BLM would make the case that areas meet the definition of ACECs per se (they are relevant, important, and in need of special management), yet BLM can only outline site-specific management for these resources under a don't-call-it-an-ACEC scenario. This is an untenable position, and does a disservice to the use of ACECs as a tool that should be given priority in this planning process. While the current RMP does not outline any management for the ACECs, that should in no way limit BLM from doing so in the revision.

Finally, this document does not describe the full universe of ACEC that have been proposed.

## III. Our recommendation for improvement is:

Instead, I would recommend that this alternative (and the RMP) be used to highlight the proper designation and management of ACECs, retaining all the current ACECs (all I'm talking about here). Through the RMP a site-specific management plan can be drafted for the ACEC that can protect or enhance the resources at issues while monitoring. This management plan can also get at some concerns from those that oppose ACECs not for their name, but how without detailed planning, their operation is often vague, incomplete, or end up being an ACEC in name only without actually protecting the stated resources.

Language: All alternative that include ACECs should also make an RMP provision for BLM a crafted site-specific management plan for resources identified as relevant and important.

Comments are due to Jeremy Casterson (jeremy\_casterson@blm.gov or fax: (970) 826-5002) and Helen Littrell (hlittrell@keystone.org or fax: (970) 262-0152) by no later than 4:00 p.m. MDT on Tuesday, July 5, 2005. If you are unsure of whether your idea is an RMP-level suggestion, please call Jeremy Casterson at 970-826-5071.

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**IV. We have a concern with the following section:**

**Topic: Citizens' Wilderness Proposal** \_\_\_\_\_

**Page number: generally** \_\_\_\_\_

**V. Our concern is:**

The document does not take into account boundary issues related to the CWP (or at least it is not clear).

The document does not address the full universe of ACECs that have been proposed and are currently in preparation.

Vermillion Alt. C. should consider the alternative that the lands be leased NSO, and be used to showcase the best available technology and management practices (this was discussed the last NWCOS subcommittee meeting).

**VI. Our recommendation for improvement is:**

BLM needs to be clear that additional ACECs will be considered in this document.

BLM needs to be clear on the exact boundaries of area likely to have wilderness characteristics.

BLM should make alt C for Vermillion NSO as discussed.

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**VII. We have a concern with the following section:**

**Topic:** Oil and Gas \_\_\_\_\_

**Page number:** 69, 77+ \_\_\_\_\_

**VIII. Our concern is:**

The proposal for unstudied exception and waiver is the type of “adaptive” management that we oppose. The beginnings of what would truly be an adaptive management alternative have not been articulated, including the following: implementing, monitoring, analyzing information, making changes to exception criteria. Instead, this appears to be establishing what we are most fearful—a streamlined process for waiving or excepting stipulations without the follow-up and treating each reason as an indicator that can be studied and monitored so that BLM and the public can learn from these actions.

**IX. Our recommendation for improvement is:**

Our general recommendation is that this approach be scaled down to a size that BLM staff and funding could accomplish. This approach should also study the implications of waiving or excepting stipulations and the appropriateness and efficacy of any mitigation measures. BLM resource specialists should identify a couple of these indicators or existing stipulations with poorly defined exception criteria that could be monitored.

Language:     add study of indicators, impacts, and outcomes (and scale down)

                  Add study of mitigation measures

                  Add fall back if this “adaptive” approach should fail

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**X. We have a concern with the following section:**

**Topic: Travel** \_\_\_\_\_

**Page number: 87+** \_\_\_\_\_

**XI. Our concern is:**

Adaptive management seems to only be used in the Open-Limited-Closed hierarchy to move within the category Limited (from existing to designated). While moving from existing to designated could bring appreciable, BLM should not relinquish the ability to designate areas as “closed” to motorized use if monitoring or adaptive management indicate such a move is warranted.

The “adaptive” portion is nothing adaptive, but merely states that there ought to be another collaborative process.

Planning for Sand Wash (beyond designating an open area) is delayed at least another 5+ years. This is not acceptable.

The range of alternatives does not reflect what NWCOS already agreed to—that WSAs would be closed in Alt. D.

**XII. Our recommendation for improvement is:**

If BLM wishes to improve OHV management adaptively, the option to close broad areas must be retained. The “adaptive” portion should include the ability for BLM to move from Limited to Closed.

Language:

Alt C. should expand adaptive principles ranging from limited to existing to closed.

This section ought to included principles of adaptive management (monitoring, analyzing, adapting), not simply stating that it is adaptive (this section should also realize institutional limitations to employing AM).

Transportation planning for Sand Wash should be outlined in this plan, and references to dragging it out another 5+ years should be stricken.

Alt D. should be changed to closed for all WSAs and adaptive from designated to closed in Alt C for the 5 WSAs that are open.