

**NWCOS COMMENT FORM FOR JUNE 27 DRAFT
ALTERNATIVES**

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We have a concern with the following section:

Topic: Travel Management _____

Page number: Page 88 Travel Management C _____

Our concern is: This section does not adequately define Open, Limited and Closed. This section does not go far enough to define what in the landscape will be effected.

Our recommendation for improvement is:

An Off Highway Vehicle management plan will be developed. It will consist of Open Areas, Limited Areas (both Existing Route Areas, Designated Route Areas) and Closed Areas. A comprehensive map will be developed at the earliest opportunity that clearly defines all of the existing routes in LSRA. In all but Closed Areas, adaptive management principles will be used to reduce resource degradation.

A detailed description is attached

Appendix ???

There has been much discussion about various types of route designations. I propose the following designations:

OPEN AREA

The eastern boundary is CR 67. The northern boundary is the ridgeline north of Vaughn Draw. The west boundary is Route 2048F6. The south boundary is SR318. The size of this open area is approximately 9,600 acres. An option is to extend the Open Area into Sheephead Basin. Sombrero Ranches has considerable private holdings that span the Basin and those issues will have to be resolved prior to designation as open. Moreover, the Citizens Wilderness Proposal butts up to the Basin and that issue needs to be resolved with some sort of buffer zone.

Clay Buttes is also proposed as Open. The boundaries are the roads circling the Buttes. Access is route 2048C and 2047. The size of Clay Buttes is approximately 1000 acres. There is an issue arising out of a court case (Nottingham, Raftopoulos, et al, v BLM, High Desert Racing and Little Snake MC 1987) where Federal Judge Richard Maich held a settlement conference with the livestock producers after the trial. It is my recollection that Clay Buttes was to either closed or designated routes only. As LSMC was not a party to the settlement, we were not a witness to the hearing. John Husband is investigating.

The definition of OPEN is free cross-country travel anywhere within the open area.

EXISTING ROUTES AREA

The entire LSRA will be designated Existing Routes until the BLM convenes a Travel Management Working Group and develops a comprehensive travel management plan.

An existing route must be a clearly defined trail or two-track. It must have evidence of vehicle passage or stock passage. A game trail is not to be construed as an existing route.

The main goal of Existing Routes is to reduce the proliferation of unneeded routes.

Designated Routes Area

The area outside of the Open Area will be designated as Designated Routes Area, unless closed as Wilderness or some other specific resource issue All routes of travel must be signed as Designated Routes. The BLM will bring all of the affected parties to the table to collaborate on what routes are to be designated. All designated routes may be used by all users, unless it is a single track and then it will be signed for use by motorcycles only. It is understood that livestock operations rely heavily on the road system within the Resource Area. The objective of

designated routes is to reduce unneeded routes. All water developed sources must have vehicular access and the goal of this proposal is to insure that access.

In many places within the Resource Area, there are routes through sensitive areas, ie, ACECs, etc. Some folks have asked that these areas be left as existing route. From a managerial standpoint, this does not make a lot of sense. All routes outside of Open and Existing must be designated, particularly in sensitive areas. One of the issues that I have heard from the BLM, is protection of sage grouse leks. This can only occur with designated routes. The same is true with cultural and archeological sites.

Adaptive Management

Active monitoring over time must be implemented to determine if excess resource damage is occurring. If it is determined that excess damage is occurring, repair to the route will occur first. If that does not solve the problem, the route may be closed or rerouted around the damage. Any route that is closed must be reclaimed to its natural state as best as possible. The BLM should actively solicit all local user groups to assist in route maintenance and repair. The BLM should give volunteers maximum incentives to help offset volunteer expenses.

