

BEVERLY RAVE
COMMENTS ON CWPS 8/8/05

VERMILLION BASIN

I do not believe that Vermillion Basin meets the criteria for wilderness characteristics because there are and need to continue to be access roads to reach the State Trust Lands in the study area. Many of these roads have been in place for decades and provide access, for us, and others to view and appreciate what is on our lands in the area. Many of the individuals that obtain written permission to access our lands in the area would not be able to hike the many miles necessary if the roads were closed. We also need to maintain access for grazing lessees and the ability to complete and enhance improvements on our lands in the study area. There is also increased interest in the mineral potential in this area and access to develop our minerals should we choose to do so is paramount to fulfilling our mandate from the federal government and by State Statute to generate money for the trusts. I am also concerned about the economic impact this may have on the local community if mineral development cannot be pursued on the public land. Hopefully this area will be dropped from consideration permanently.

Historic mineral development in the basin.

Cold Springs Mountain

I disagree that Cold Springs Mountain meets the criteria for wilderness characteristics because there are multiple existing roads through the area that have been there for decades and need to remain to provide adequate access for livestock grazing, improvement maintenance, and recreation such as hunting. I am also concerned about the economic impact this may have on the local community if mineral development and other uses, i.e. motorized recreation, cannot be pursued on the public land.

Dinosaur North including Happy Hollow

I disagree that this area meets the criteria for wilderness characteristics because there are multiple existing roads through the area that have been there for decades or that may need to be constructed to provide the State with the opportunity to develop our mineral interests within your proposed study areas, as mandated by the federal government and by State Statute to generate money for the trust. I am also concerned about the economic impact this may have on the local community if mineral development cannot be pursued on the public land.

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.

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”.

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.

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.

Recreation

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.

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.

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".

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...".

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

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.

These have been the biggest concerns I have along with the protection of access to our lands and severed minerals as well as the protection of private property rights. I have submitted and or participated in the submission of at least two sets of comments on the Alternatives that outline these concerns. I would like to see how those comments are handled in the Alternatives before submitting any additional comments. There really is nothing further and it doesn't make sense to continue to submit the same comments.

I will look forward to a good discussion at the cooperating agency meeting.