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To: John Husband
Jeremy Casterson

From: Moffat County

Date: August 2nd, 2005

Subject: Comments on the 7-14-2005 Draft BLM Alternatives Document

Page 6, Overall Objectives

1) Add an objective stating “Collaborate with stakeholders to establish Desired Plant Communities across the resource area.”

The purpose of this language is to give BLM the direction from the RMP level to establish DPC’s. BLM typically manages for NRCS Potential Natural Communities (PNC) rather than focusing on what land users or managers want or desire. Many times PNC will be identical to NRCS PNC’s, but many times it may not. For example, the Browns Park Refuge chose to flood 1200 + acres of upland vegetation every 3 years and change it to wetland type communities for waterfowl. The new DPC for the Hiawatha area includes exotic plants to help replace Halageton, plants that were never considered in NRCS tech guides or PNC’s. It is likely BLM would want to manage for unique DPC’s that are not PNC’s, especially considering DPC’s include social values, not just ecological values. This must be allowed in an overall objective in the Vegetation section of the RMP because it covers all aspects of plant communities in the Vegetation section. To simply place the above language in an Alternative does not allow the BLM the authority to enter into a planning effort to identify DPC’s across the Resource Area.

2) Delete last sentence on Page 8 under letter B that reads “DPC objectives will be determined through use of NRCS Range Site Guides and or updated ecological site inventory data as it becomes available”. NRCS doesn’t include social values, only ecological values. In addition there will be cases where BLM does not want to manage for NRCS PNC’s. See comment 1. (listed above) for recommendations on placing DPC’s into objectives.

3) Travel Management analysis has not included how BLM will address potential conflict between the County’s 2477 claims and any proposed closed routes. We request this be addressed in the appropriate document, possibly the impact analysis.

4) Page 74, # 2 Alt B. Remove the examples such as water quality, scenic views, ect.. They are biased toward abstract types of land values. If BLM does wish to provide

examples then we request examples also be balanced with a range of resource amenities to promote beneficial economic growth and use of the federal lands (i.e. supporting a stable tax base and providing opportunities for economic gains with business opportunities, ect.).

5)Page 74 # 3 Alt. B. Remove #3 as it highlights a specific action step that should not be individually highlighted in the Social and Economic section. To “protect special designated areas” is a land management action that fits under the special designation’s section. It highlights a specific use of lands that is not appropriate in the social and economic values section unless all specific uses of land have specific highlights, which we suggest BLM should not attempt to list.

6) Page 74 #3 Alt B. Specifically describe the intention of using the word “Target.” Change from focusing only on government business activities to also incorporating private business activities associated with public land management.

7) NWCOS livestock subcommittee agreed, in the livestock section, to place livestock a desired use, not a mere allowed use in the RMP. These changes are not reflected and should be.