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Bureau of Land Management  
Little Snake Field Office  
Attn: Jeremy Casterson  
455 Emerson St.  
Craig CO 81625

Re: Little Snake RMP

Dear Jeremy:

I am writing to submit my comments in connection with the scoping for the Little Snake RMP revision. I have been a resident of Routt County, Colorado for in excess of twenty five years and during those years have regularly visited the Little Snake BLM lands.

I am also writing on behalf of TIMBERLINE TRAILRIDERS, INC., a not for profit corporation comprised of over 125 families from northwest Colorado who enjoy off road motorcycling on public lands. We promoted the Timberline Enduro held on Routt Nation Forest land for 23 years. We have facilitated grants in excess of \$500,000.00 to maintain and improve the Hahn's Peak multiple use trail system. A large majority of our members regularly utilize the Little Snake BLM for various recreational pursuits, including, but not limited to, motorcycling, hiking, bicycling, camping and hunting.

Please consider the following comments from myself individually and as President of Timberline Trailriders, Inc.:

**Cultural. Etc.**

1. No area closures for cultural-paleontological are necessary or appropriate.
2. Site specific enclosures or signage is sufficient. Closing off whole canyons (especially since travel is now limited to roads and trails) is excessive and deprives the general public access unnecessarily.

**Energy and Minerals.**

1. Responsible oil, gas and mineral development should be encouraged.

2. Our self sufficiency as a nation is dependent upon utilizing our natural resources, not locking them up.
3. Mineral resource development has been and continues to provide significant economic benefits to the northwest Colorado area.

### **Land and Realty.**

1. The only lands considered for exchanges should be isolated tracts only.
2. Are you showing bias by indicating some public lands have a greater “value” than others?
3. All public lands have public value and should remain open and available to multiple uses.
4. Purchase of in holdings is a course of action that should be reasonably pursued, provided the seller is truly willing.
5. Strong arm tactics such as utilized by the Dinosaur NP staff in attempting to drive out the Mantel Ranch must be avoided.
6. All historic access to BLM lands across private lands should be vigorously defended. Too often public agencies fail to fight for historic rights of way that are well established under Colorado law.
7. Condemnation of rights of way should also be effectively used. The public lands must be reasonably available to the public. Backing down to the groundless demands of private land owners should be avoided.
8. All of the traditional and historic roads and tracts from Highway 318 and Irish Canyon must be preserved or reopened.
9. R.S. 2477 rights of way should be verified and mapped in cooperation with Moffat County.

### **Special Management Areas.**

1. Travel in the original Wilderness Study Areas should be open but limited to existing roads and trails. Most of these original WSA’s have a multitude of roads and trails. Your only management concern should be to follow the law to insure that the “values” originally identified are not lost or destroyed. Your job is not to create a wilderness area where none existed. Using the existing roads and trails does not impact upon the “values” and these travel ways should be re-opened.

2. New attempts to revisit the wilderness study designations brought on by the Clinton administration have been established in court actions to be illegal and contrary to the Wilderness Act. No lands under this wasted and biased action should be designated as WSA's or any other restrictive prescription. All such lands should retain their original designation. All of the new areas were a joke in that they were heavily impacted by the signs of man such as roads, seismic lines, etc. Cleverly ignoring these items by calling them "ways" was just an example of how corrupted the Clinton administration was.
3. There are no areas in the Little Snake area that warrant wilderness designation.
  - a. The Irish Canyon ACEC or wilderness study area designation is a joke. Roads travel up and from the Irish Canyon road. A well-established jeep road traverses all of Vermillion Canyon. Fences and seismic lines traverse the area. ACEC's in Vermillion Canyon have blocked many historic travelways without justification or logic.
  - b. Lookout Mountain is traversed by roads and trails. Making roads disappear by calling them "ways" is a joke.
4. ACEC designations now in place should be withdrawn and no more should be used. This is simply code-speak for treating lands without the requisite wilderness characteristics to be treated as wilderness. With access limited to existing roads and trails, great protection will be afforded to areas without restricting the public's access. No restrictive designations are needed.

### **Travel-Recreation.**

1. If determined necessary by new federal management prescriptions, motorized travel should be restricted to existing roads, trails, tracks and ways, not designated routes.
  - a. All seismic roads should be open to motorized travel.
  - b. All washes should be open to motorized travel.
  - c. All "ways" should be open to motorized travel.
2. If it is determined that motorized travel should be restricted to designated routes, it should only be done in separate site specific proceedings, after the BLM and interested parties have reviewed the existing routes. In the interim, travel should remain open but limited to all existing roads, trails, etc.
3. Foot, equine and bicycle travel should be limited in the same manner as motorized use. There is no justification for believing that a motorized tire causes more damage than a non-motorized tire, or a vibram sole or a horse shoe.

4. One or more unrestricted “play areas” should be established.
5. Management designations should allow for future trail construction.
6. ATV travel should be restricted to roads and prohibited from single track trails.
7. Staging areas should be provided with hardened surface access roads and minimal improvements for camping. Play should be provided near these staging areas.
8. The BLM lands should be managed to provide for multiple use recreation. No areas should be closed to any legitimate use. Once you start allocating areas for particular uses you’ll have a never ending supply of requests for closures and restrictions. People should share.

### **Grazing.**

1. Grazing should continue in its present form. The BLM should work with ranchers to better provide water and feed for increased range utilization.
2. Range improvement actions should continue. Listen to the ranchers.
3. No areas should be restricted from grazing.
4. Grazing and other uses have minimal impact on erosion. The soils in the area are highly erodible and nothing people or animals do increases that propensity. The lands will continue to erode whether you bar all people and animals or whether the current mix of usage continues.
5. There are very few riparian issues to concern yourself with. Vermillion Creek is the only thing resembling a year round stream and vehicle crossings and grazing have no adverse effect.

### **Wildlife.**

1. Excessive numbers of deer, elk and horses severely impact the forage available for livestock grazing. Harvest of excess numbers of elk and deer and capture of excessive wild horses should occur to protect the historic and reasonable grazing allotments.
2. No special management restrictions are necessary for wildlife or T&E species (if there are any).
3. The “ecosystem” of the Little Snake seems fine and adapting well to fires, drought, floods and people – just as it has for centuries.

**Summary.**

1. Keep the area multiple-use friendly.
2. Avoid the mistakes of the Forest Service in their Forest Plans. They are unreadable, unintelligible and attempt to micro-manage every square inch of the lands with restrictive provisions. No member of the public has the time to review and comment on the mass of these designations. Then, having been stuck with worthless plan, their future flexibility is severely restricted.
3. Keep the management prescriptions broad and friendly to all future uses. Allow the local management team to have flexibility to deal with future needs reasonably.

Thank you in advance for your consideration.

Robert H. Stickler

Timberline Trailriders, Inc.

By:

Robert H. Stickler, President