

## **Vermillion Ranch**

Limited Partnership  
14883 merd 10n  
Maybell Co. 81640  
970-365-3677

TWRIGHTDICINSON@direcway.com

1/31/05

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

Dear Jeremy

On behalf of my family I would like to thank you and the Bureau for the opportunity to provide scoping comments for the Little Snake Resource Management Plan (LSRARMP). We reserve the right to extend our comments in the future.

By reference I am including our previous AMS comments into these scoping comments as well.

### Ecosystem health

As reflected in our AMS comments we believe that LSRA has a relative intact and functioning ecosystem. However that system suffers from Pinion- Juniper encroachment and general decadence of the sage brush steppe from the absence of fire. This has adversely affected our preference AUMs as noted by a reduction in carrying capacity in our permit renewal. The BLM is mandated through the Taylor grazing act (TGA), Public Range Land Management Act (PRIA), Multiple Use and Sustained Yield Act (MUSYA) to provide for the stability of the grazing industry. We therefore request that the RMP require a desired plant community and future condition that supports full historic grazing preference AUMs.

We support the reintroduction of fire use, back into the ecosystem by the BLM and Moffat County fire plans. Adequate funding must be secured to implement those plans. Most of the vegetation communities in the LSRA are fire dependant and have been seriously degraded by a history of fire suppression. This action has decreased livestock and big game carrying capacity, lowered ground cover thereby increasing the potential for erosion and imperiling special status species like sage grouse.

We recommend developing a desired plant community that enhances and supports all of these uses including livestock grazing.

### Special Land Designations

Past designation of land such as ACEC, Wilderness Inventory and Study areas have adversely affect our grazing operation. These designations adversely fragment landscapes and frustrate landscape scale management. These designations have delayed or prohibited necessary range improvements need to sustain our grazing Preference. We are opposed to any land designation that dose not provide for the full and permanent continuation of grazing for the life of the designation and any new improvements or technologies necessary to maintain such use. Furthermore vermilion basin lacks wilderness character due to all the roads trails and man made structures that support our grazing.

### Socioeconomic

Our Livestock grazing operations contribute significant economic support to the communities of: Craig & Maybell Colorado, Vernal & Manilla Utah, and Rocksprings Wyo. Many of the livestock operations have similar impact in and out side of Moffat County. The BLM must analyze the full range of impacts that livestock grazing contributes to surrounding communities both from a socio as well as an economic perspective as required by NEPA Those decisions should not adversely affect our permits.

### Livestock Grazing

BLM must support and enhance livestock grazing operations as required by TGA, PRIA, and MUSYA. To that end we request that the RMP support the development of a desired future condition for the range land that sustains and enhance the livestock industry and at a minim maintains historic grazing allocations.

Livestock grazing on public lands directly contributes to the continuation of private lands in open space the BLM RMP must consider and recognize this interrelationship in its decisions.

### Wildlife

The BLM must address the over utilization of range and riparian areas by Big game species. The BLM must require that the CDOW DAU plans be based on the carrying capacity of the resource and the allocation of grazing users. We oppose any reallocation of grazing AUMs to wildlife. If additional capacity is need develop it don't steal it.

### Wild horses

The above wildlife concerns apply to wild horses as well. We oppose the BLM practice of denying domestic horse permits adjacent to wild horse herd areas the RMP so reject these prescriptive management approaches. We oppose the expansion of wild horse herd areas an request that the BLM keep their horses on their side of the fence.

### Out come based management

We support and encourage the BLM to adopt a simple RMP outlining the desired out comes (goals) for each resource use. Reject the traditional prescriptive approach. Leave the flexibility to implement those goals to the activity level through the use of adaptive management objectives. The RMP should recognize and support "net affects".

### Cultural resources

Cultural resources must not prohibit the responsible use and development of other uses. The RMP should outline a desire program to understand and protect resources that the community deems important while allowing development. The policy of avoidance should be discontinued in favor of determining when we have enough information and allowing programmatic clearing of land based on relevant information.

#### Agricultural Trespass

Lands with Ag trespass should be designated for disposal to the affected landowners based on net affects.

#### Special status species

The designation of species or habitat must not adversely affect other uses or users  
The Net Affect of such designations must be fully analyzed and justified.

#### Valid existing rights

The RMP must consider and recognize all valid rights and their impacts on the plan.  
These rights include but are not limited to: Water & ditch rights, Public rights of way including stock drive ways, and the prior right of grazing use (preference).

#### Multiple Uses

We support the responsible multiple use of public lands by recreation, oil and gas as well as other users so long as they are held to the same standards as grazing users. Specifically we support responsible use and development in vermilion basin that respects our grazing needs.

#### Local plans

We support the BLM being consistent with local plans

RESPECTFULLY SUBMITTED

T. WRIGHT DICKINSON

FOR VERMILLION RANCH LTP