

April 5, 2005

455 Emerson Street
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Jeremy Casterson,

Moffat County appreciates the opportunity to comment on “Attachment C” addressing draft goals, alternatives, and visions for the RMP. Our comments are as follows:

Overarching RMP Goals/Vision

- 1) Add the following Goal: Shift resource management from prescriptive management to “adaptive management” through greater use of science and monitoring.
- 2) At the end of the sixth bullet point, add “...and social values.”

Vegetation

- 1) We do not understand the intent of “maintaining connections” mentioned in the second bullet point, please clarify. If this is to encourage continuous corridors between a variety of plant communities, we would suggest deleting this bullet point.
- 2) We suggest adding a bullet point to say “Collaborate with stakeholders to identify and manage for Desirable Plant Communities.”

Sagebrush Management

- 1) change the first bullet from “maintain large patches...” to “maintain patches appropriate for maintaining high quality sagebrush habitats.” We are concerned that large contiguous patches are more susceptible to wildfire and range-wide habitat destruction than smaller disconnected patches.
- 2) Clarify the wording of “connections” between sagebrush habitats, especially in the venue of our previous comment.
- 3) The first bullet under part B. speaks of “reconnecting” large patches of sagebrush. Again please clarify this language.

Riparian/Wetlands

- 1) Bullet point A3, please add “maintain or improve watershed hydrology.
- 2) Bullet point B1 change wording from “removing” existing sources of degradation to “work with stakeholders to improve or remedy”
- 3) Change bullet point “B” from being solely dependent on Proper Functioning Condition to using Proper Functioning Condition as one tool to monitor. We do ourselves a great injustice if we only achieve PFC’s and not address other goals. We recommend a goal be added that quantitative assessments occur along-side of PFC assessments with a complete interdisciplinary team and not one individual.
- 4) Change Bullet B1 from protecting against new sources of degradation to “minimizing degradation”

Weed Management

- 1) Add a bullet to “encourage land users to participate in the Northwest Colorado Weed Cooperative Partnership.”

Forests/ Woodlands

- 1) No Comment

Wild Horses

- 1) Change A2 to read “reduce conflicts between wild horses, livestock and other uses/resources.”
- 2) We support language to reevaluating and adjusting existing AML’s to assure that wild horse use is balanced with other uses.

Paleontological Resources

- 1) No Comment

Cultural Resources

- 1) Add “develop models and sampling methods to aid in releasing selected areas from cultural restrictions.” This will help prevent the avoidance issues that typically prevent new developments or land uses. It will also help identify when sufficient samples of cultural resources are recovered so that multiple uses can continue.
- 2) Add “conduct cultural reviews of the Union Cellular Tower site to determine if the “temporary close to motorized access” designation is warranted are able to be released.

Visual Resources

- 1) add a bullet point to collaborate with stakeholders to identify VRM objectives
- 2) remove “based on BLM guidance” from the second bullet

Air

- 1) No Comment

Minerals and Energy

- 1) We support the existing language which is consistent with current national energy policy.

Transportation and Access

- 1) A bullet will likely need to be added to accommodate the response of the BLM solicitors office on RS 2477.

Travel Management

- 1) Same comment as above.

Livestock Grazing

- 1) Add a bullet to “Collaborate with stakeholders to identify and manage for Desirable Plant Communities.”
- 2) Add a bullet to “credit livestock producers for using AUM’s to manage rare species or habitats.”
- 3) Change Bullet A1 by adding “...as well as livestock needs.” At the end of the sentence.
- 4) Change bullet A3 from managing for utilization to using utilization and other monitoring efforts as a vegetation monitoring tools. The current language highlights a severe mismanagement dilemma if BLM is going to manage for utilization.

Lands and Realty

- 1) We recommend removing goal A3. In the absence of removing this goal, we recommend removing the reference to Thornburg and Vermillion. In the absence of removing these references, we recommend adding “...where local governmental support exists.”

Fish and Wildlife Habitat

- 1) Bullet A1 and A2 remove or justify the “large patch” and “connection or connectivity” statements throughout the entire section.
- 2) Bullet C, add a goal to “Manage wildlife habitats based on sound science and adaptive management.”
- 3) Bullet D1, add ... without diminishing existing permitted forage allocations.
- 4) Bullet E1 and E2, add ...without infringing on existing rights to access i.e. RS 2477 routes.
- 5) Bullet F3 places native fish populations on a pedestal to sport fish. This goal should be reworded to ‘comply with the ‘USFWS Recovery Program’ goals which attempt a balance between sportfish and endangered fish.

Special Status Species

- 1) Bullet A1 A2 A3, add “...while incorporating safe-harbor incentives for land users. The intent with this language is to provide assurances that land users are not simply “kicked off” the ground and rare species placed on a pedestal above traditional uses. Where there is sound science to show traditional uses are in conflict with rare species management, BLM needs to not always go to removing these uses as the first option, there should be legitimate effort placed into balancing the uses with protection of the species.
- 2) Change the word “continue” to “Prioritize” in Bullet A4

Recreation

No Comments

Special Management Designations

1. Add a bullet to “Evaluate whether or not existing ACEC designations offer “additional protection” above and beyond what can be protected through traditional management, stipulations, or adaptive management.”

Soils

1. No Comment

Water

- 1) Change bullet B1 from “minimize” to “Use Best Management Practices in and near streams...”
- 2) Change bullet point B3 from having a sole goal of Proper Functioning Condition to using Proper Functioning Condition as one tool to monitor general stream health. We do ourselves a great injustice if we only achieve PFC’s and not address other goals. We recommend a goal be added that quantitative assessments occur along-side of PFC assessments with a complete interdisciplinary team and not one individual.
- 3) Change B4 from “removing existing sources of degradation” to “cooperatively implementing best management practices to minimize degradation.” The impetus here is to not provide a tool to blame one use for a poorly functioning stream, but to address all issues and cooperatively come to resolution, rather than assuming that “removal” of a use is the answer.
- 4) Change B5 from “prevent” to “minimize”

Fire

No Comments, nicely worded.

Sincerely,
Moffat County