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**Comments on Draft BLM shell of alternatives
(Comments on goal posts from NWCOS subcommittee)**

Minerals and Energy

Potential Range of Options for Alternatives

Include in the range of goals posts in the draft RMP review current leasing stipulations and identify areas that need changes/modifications. We have the potential to apply adaptive management principles, but it is difficult if stipulations are restrictive on each lease. We need to have flexibility built into the stipulations in order to be able to apply adaptive management principles. An example of being able to apply adaptive management and have some flexibility in stipulations would be the proposal put forth by Julander Energy Company on year round drilling and enhancement of critical winter range wildlife habitat. Julander proposed to enhance critical winter range wildlife habitat in exchange for the BLM's permission and flexibility to drill natural gas wells in areas with existing critical winter range stipulations. They only asked for a small percentage of land to be able to drill year round and in exchange they would put money on the ground for wildlife habitat. This is what we are looking for, thinking outside of the box and putting money on the ground to improve the condition of the land and habitat. Flexibility needs to be built into the stipulations through the RMP process.

No Action-Vermillion Basin was administratively withdrawn from leasing. In the no action alternative, which is the current RMP, leasing is open to oil and gas. I think that needs to be clarified in our statements.

In between the goal posts or in the alternatives we should have discussion on the issue of oil and gas drilling in ACEC's or Special Recreation Management Areas and proposed wilderness in Vermillion. In draft comments submitted by Colorado Wilderness Network they stated the following: "Identify and make available federal oil and gas estate, to include CBM for exploration and development in potentially productive areas consistent with other multiple use." According to the most recent map produced by the BLM Vermillion Basin (proposed wilderness) and Sand Wash Basin (proposed ACEC for white tailed prairie dog), are two basins with high potential for oil and gas exploration and drilling. If both of these major acreage areas are closed (245,000 acres in Vermillion and 100,000 acres in Sand Wash), we will not achieve our goal to maximize federal gas estate. Even if the argument still continues on the word maximize and we use CWN word "make available," we still need to have those areas open for oil and gas drilling in order to maximize gas resource in the high potential areas.

Areas of Special Designation and Wild Lands

The word wild lands should be removed from this heading. We had this discussion back in January when we put together our formal scoping comments from NWCOS on the RMP. We came to agreement that the heading would be special designations. We need to change that in our comments.

As we placed the various polygons of special designations on the map, it appeared to be a landscape of protected areas and no uses. One of our overarching goals is multiple use of the public land. We need to instill the trust with the environmentalists that this land will still be productive and protected without all the listed designations. The question that comes to my mind is who would manage all of these designated areas, and the hundreds of thousands of acres they are asking to protect.

If we continue with all of these special designations, we need to add which areas are appropriate for special designations and what definitions will be used to determine the qualifications for special designations. We also need to answer the questions of what are the desired outcomes for these designated areas and what uses are allowed in special designation areas.

This area lends itself to adaptive management. We did not discuss adaptive management principles in our meeting. We should identify those indicators to be monitored to determine if desired future conditions are met.

Transportation and Recreation

On one side of the goal posts relating to transportation and access we need to recognize RS2477 and Moffat County's claims to these roads and ways.

I question if the use of OHV's for hunting is an issue for this RMP or a Division of Wildlife issue?

Habitat Management

Fish and Wildlife Habitat

Under big game winter range consider adding flexibility into each lease by increasing the amount of time for drilling activity while protecting big game winter range. Improve the habitat by using adaptive management tools in collaboration with the oil and gas industry.

All Grouse Species

The oil and gas industry would be willing to work with the BLM in protecting sage grouse and enhancing the habitat. I think that we need to be more flexible with the stipulations and collaborate with the industry to improve sage grouse habitat.

Submitted to the LSRO
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