

To: Jeremy Casterson  
Little Snake Field Office  
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From: Rick Hammel  
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## OVERARCHING RMP GOALS/VISION

- ⑩ Maintain and restore healthy ecosystems.

### Comment:

In order to restore a healthy ecosystem, there are three goals to be met: cores, corridors and carnivores, the three Cs of ecosystem restoration. Currently most of the top carnivores are missing from this ecosystem. There are corridors that are being shut off to wildlife migration due to development. There are far too few core areas available to wildlife, ie, wilderness. *Ref: Michael E. Soule` and Reed Noss, "Rewilding and Biodiversity as Complimentary Goals for Continental Conservation" Wild Earth, Fall 1998, 22*

## RMP RESOURCE GOALS

### Vegetation

#### Sagebrush Management

- A. Sustain the integrity of the sagebrush biome to maintain sustainable populations of greater sage-grouse and other sagebrush obligate species.
  1. *Maintain large patches of high quality sagebrush habitats.*
  2. *Maintain connections between sagebrush habitats.*
  
- B. Identify and initiate restoration and rehabilitation of sagebrush habitat.
  1. *Reconnect large patches of sagebrush habitat.*
  2. *Reduce encroachment of juniper and other woody species into sagebrush habitat.*
  3. *Restore a diversity of seral stages within sagebrush communi*

### Comment:

All of the Vegetation section falls within the comment on cores and corridors. Both A and B are essential to ecosystem restoration.

#### Riparian/Wetlands

- A. Maintain the integrity of streams and their associated riparian values on public lands that meet land health and water quality standards.
  1. *Minimize disturbance in and near riparian/wetland systems.*
  2. *Monitor and control invasive species.*
  3. *Maintain watershed hydrology.*
  4. *Recognize and manage riparian/wetland communities as a unique and limited high value vegetation type.*

- B. Achieve proper functioning condition in existing riparian/wetland systems that do not meet land health and water quality standards.
  1. *Identify and if possible remove existing sources of degradation.*
  2. *Protect riparian/wetland systems from new sources of degradation.*

**Comment:**

The majority of riparian systems within the LSRA are degraded from livestock grazing. While it is fully understood that livestock requires water, provisions must be made to exclude livestock from the majority of riparian areas. Riparian areas will recover within a five year period if given a rest to regenerate. Also a little help can enhance that rate of recovery in the form of planting potted plants or cuttings. But large wildlife and livestock must excluded from the recovery areas

**Weed Management**

- A. Reduce the occurrence of noxious and undesirable plant species.
  1. *Ensure all land use actions that could potentially increase the occurrence of noxious weeds are conducted using Best Management Practices.*
  2. *Apply principles of integrated pest management.*
- B. Integrate weed management across landscape and ownership boundaries.
  1. *Maximize use of cooperative agreements to coordinate weed management actions.*

**Comment**

Invasive species are one of the primary causes of extinction. Many conservation biologists believe that North America is in an extinction crisis due to the actions of human activity. It appears that invasive plants follow this human activity.

- **Forests/Woodlands**
  - A. Manage for healthy forest and woodland communities.
    1. *Increase the species diversity and distribution of age classes within the forest and woodland ecosystems.*
    2. *Recognize and manage aspen as a unique and limited high value vegetation type for other resources.*

**Comment:**

Elk have been shown to be a limiting factor in the regeneration of willows, cottonwood and aspen. Missing carnivores will help to reduce the population of elk to its target population of 12,500 elk. The current population in just the Bears Ears herd is >30,000. Combine this population with the Flattops herd of >80,000, the winter range is far to great. The aspen regeneration wis probably non-existent. *Ref: Ripple and Bescheta, in press. Brad Petch, CDOW biologist, personal comm.*

**Minerals and Energy**

- A. Allow for the availability of the federal oil and gas estate (to include CBM) for exploration and development consistent with national policy.
  1. *Identify and maximize the availability of federal oil and gas estate (to include CBM) for exploration and development in potentially productive areas to increase*

*energy supplies.*

*2. Facilitate reasonable, economical, and environmentally sound exploration and development of oil and gas resources (to include CBM).*

- B. Allow for the availability of federal locatable minerals, mineral materials, non-energy leasable minerals, and others for exploration and development consistent with national policy.
  - 1. Identify and maximize the availability of federal locatable minerals, mineral materials, non-energy leasable minerals, and others for exploration and development in potentially productive areas.*
  - 2. Facilitate reasonable, economical, and environmentally sound exploration and development of federal locatable minerals, mineral materials, non-energy leasable minerals, and others.*
  - 3. Provide mineral materials needed for community and economic purposes.*
  - 4. Minimize and eliminate fraudulent claims.*
  
- C. Allow for the availability of the federal coal and oil shale estate for exploration and development consistent with national policy.
  - 1. Identify and maximize the availability of federal coal and oil shale estate for exploration and development consistent with the suitability study for coal to increase energy supplies.*
  - 2. Facilitate reasonable, economical, and environmentally sound exploration and development of federal coal and oil shale estate.*

Comment:

Oil and gas exploration should not be clearing so much vegetation from their pads. With self-contained drilling rigs, the impacts to vegetation and wildlife would be greatly reduced.

### **Travel Management**

- A. Provide for acceptable modes of access and travel that will protect resources, reduce conflicts, and provide a mix of motorized and non-motorized recreation.
  - 1. Within five years of the completion of the RMP revision a road and trail system will be identified within areas of restricted travel management designations.*
  - 2. Provide a trail system through areas that currently do not have managed trail system.*
  - 3. Managed roads and trails should be numbered and signed on the ground. Signing will include allowed uses and activities.*
  - 4. Identify a managed road, route and trail system within the planning area.*

Comment:

The trail system should be completely implemented, as soon after the RMP is signed, to reduce environmental damage. An OHV implementation committee should be convened as soon as possible to determine the trail system. There has been interest shown that the OHV community wants to participate in that decision making process.

## **Fish and Wildlife Habitat**

Comment:

Overall, the Fish and Wildlife section is good. My only comment is for the health of the ecosystem, carnivore must be reintroduced to the area. My suggestion is to work with US Fish and Wildlife Service and CDOW to reintroduce mountain lions, wolves, black bears and grizzly bears into suitable habitat. This will repair the trophic cascade, or top down food chain, which has been missing for 65 years. (Note, On Jan 31, 2005, 9<sup>th</sup> Circuit District Court, Judge Jones, ruled that grey wolf, *Canus lupus*, has not been recovered from a significant portion of its historic range. He said that in order to comply with the ESA, this species would have to be recovered in a significant portion of its range to delist. It is understood that if the wolf is reintroduced into LSRA, there will be conflicts. However, in the Madison and Paradise Valleys in Montana, the livestock producers are beginning to learn to live with wolves. As new ways of protecting livestock are developed, acceptance is becoming greater.

## **Special Management Designations**

- A. Provide special management attention to those areas where special management is required to protect and prevent irreparable damage to important natural, cultural, recreational, or scenic resources and values.
  1. *Manage WSAs to protect wilderness characteristics until designated or released by Congress.*
  2. *Identify and evaluate all river and stream segments and determine eligibility and suitability for wild and scenic river designation under the Wild and Scenic Rivers Act.*
  3. *Review current ACECs and analyze proposed areas to determine relevance and importance criteria and determine if current management is adequate.*
  4. *Complete motorized route designations for special areas that are not closed to motorized vehicle use within five years of the completion of the RMP revision.*

Comment:

Linkages, or corridors, must be established between WSAs. Probably the best way is to designate them as ACECs or Limited Designated Routes Only. There should be no fences in these corridors, to allow free passage of wildlife.

Respectfully submitted,

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