

From: Suzanne Jones <suzanne_jones@twi.org>
To: Jeremy_Casterson@blm.gov
02/08/2005 07:42 PM
cc: "Reed Morris" <cwnrcraig@indra.com>
Subject: AMS Comments

Jeremy--

Thank you so much for the opportunity to comment on the AMS.

Please find comments from Reed Morris and me in the attached form.

Just for the record, these comments are not comprehensive in nature, but represent our quick response to several key sections. (Silence on the other sections does not represent agreement, but more of a lack of time to do a thorough review.)

Also, I am attached a document that includes a history of the Vermillion Basin process; this document was prepared by Jim McBrayer a long time ago, but is the kind of information that should be included in the AMS or Appendix. I presume he could give you an official copy. The same sort of chronology should also be included for Yampa River and Pinyon Ridge, but I am not sure he ever did one for them.

Thanks again.

Suzanne (and Reed)

**LITTLE SNAKE DRAFT AMS COMMENT FORM:
COMMENTS FROM THE COLORADO WILDERNESS NETWORK AND THE WILDERNESS SOCIETY**

NAME	SECTION	PAGE	¶	LINE	COMMENT
Introduction	Purpose and Need for the RMP revision	1-1		38	This bullet-point should read: "Management of lands containing wilderness character, including non-WSA areas such as the Vermillion Basin, where a 2001 BLM inventory found over 77,000 acres of wilderness character."
Introduction	Purpose and Need for the RMP revision	1-2		3	Add "and citizens" after "local levels of government"
Introduction	General Description of Planning Area...	1-2		40	Add "Browns Park National Wildlife Refuge" after "Dinosaur National Monument"
Introduction	General Description of Planning Area...	1-3		1; Table 1.1	This table should also include LSFO-managed split-estate minerals (1.1 million acres) as percentage and total acreage by county.
Introduction	General Description of Planning Area...	1-3		4	Add "wilderness" or "lands with wilderness character" to this paragraph of resources and/or resource uses discussed in the AMS
Introduction	General Description of Planning Area...	1-3		6	Add "resources" after "cultural and heritage"
Introduction	Key Findings	1-3		31	Replace lines 31-34 with: " Status of Vermillion Basin and Other Non-WSA Wilderness Character Lands. Vermillion Basin has been recognized by the public and confirmed through BLM inventory as possessing wilderness character. Concurrently, the area may also be valuable for production of oil and gas resources. BLM has suspended oil and gas leasing decisions pending an RMP review of the existing values. Six other areas, including additions to existing WSAs, have been proposed for wilderness protection by citizens since 1994; management of these areas will also be considered in this planning process."
Planned Actions	Energy and Minerals	2-14		4	This section (or the appropriate resource section) ought to include descriptions (along with maps) of existing lease stipulations and Conditions of Approval utilized within the LSRA, lease stipulations in place and location of existing leases, and frequency and criteria for waiver and modification of lease stipulations.
Special Status	Current Conditions	3-49		48-49	This sentence, and the species assessment to which it refers, should include data from the Colorado Natural Heritage Program and data from the U.S. Geological

Species					Survey's GAP Analysis Project. These data indicate that there are many other species to which BLM should be giving special attention in the RMP.
Wilderness Study Areas	Characterization: 3.1.12	3-66		1-2	As described in the AMS, wilderness resources exist outside designated WSAs within the Little Snake Resource Area. As such, the AMS should present "Wilderness Resources" as a separate and distinct set of resources within Chapter 3 Area Profile: Current Resource Condition and Trend.
Wilderness Study Areas	Characterization	3-69		40	Add "two" after "these". The AMS should note impairment status of other non-recommended WSA as well.
Wilderness Study Areas	Characterization	3-70		8	Change "citizen's" to "citizens"
Wilderness Study Areas	Characterization	3-70		10-11	Replace these two lines with: "In 1994, Colorado conservationists presented to BLM a bound volume entitled " <i>Conservationists' Wilderness Proposal for BLM Lands</i> " that included the compilation of numerous citizen wilderness inventories and the area-by-area justification for the statewide Citizens' Wilderness Proposal (CWP). The 1994 CWP included seven areas within the LSRA: Cold Spring Mountain, Cross Mountain, Diamond Breaks, Dinosaur Adjacent (which includes 6 units, also referred to as Dinosaur Wilderness Additions), Pinyon Ridge, Vermillion Basin and Yampa River. In 2001, based on new citizen inventories, the CWP was expanded to include new areas found to be eligible for wilderness protection around the state, including adding additional acreage added to the existing CWP areas in the Little Snake Resource Area. Table 3-20 identifies the seven proposed wilderness areas and acreages within the Little Snake Resource Area."
Wilderness Study Areas	Characterization	3-70		Table 3-20	In the Table, change "Dinosaur Adjacent" to "Dinosaur Adjacent (includes 6 units)".
Wilderness Study Areas	Characterization	3-70		14	In order to reflect accurately the history of wilderness inventory and citizen proposals in the LSRA, add the following at Line 14, before the existing paragraph starting "In accordance with BLM policy..." "In November 1995, the Colorado BLM issued BLM Instruction Memorandum (IM-CO-96-010) requesting field managers review certain CWP areas to determine if further analysis is needed for wilderness values. In December 1995, BLM Field office response indicates portions of Vermillion may warrant additional wilderness evaluation. In May and June, 1997, respectively, Colorado BLM released policy (IM CO-97-044) to address CWP areas and hold discretionary irreversible or irretrievable actions in temporary abeyance until Wilderness issues raised by the CEC can be resolved through the BLM planning process, and CO policy (IM-CO-97-051) Colorado Wilderness Review Procedures to be used in conjunction with

					<p>IM-CO-97-044. Pursuant to these policies, BLM began a multi-step process of reviewing six CWP areas on Colorado’s western slope, including three CWP areas within the Little Snake Resource Area (Vermillion Basin, Yampa River, and Pinyon Ridge).</p> <p>The BLM found the majority of all three CWP areas in the LSRA to be roadless, but concluded that only Vermillion Basin warranted additional review. Specifically, the BLM concluded that Yampa River was eligible for wilderness consideration, but was already protected well enough in the interim by its Special Recreation Management Area designation. In a contested decision, the agency found that Pinyon Ridge was indeed roadless, but concluded that it failed to meet other criteria for wilderness.</p> <p>In June 2001, the Little Snake Field office released its Final Wilderness Character Inventory for the Vermillion Basin, concluding that 77,067 acres out of 81,028 total inventoried roadless acres in the Vermillion Basin Area have wilderness character, and stated that this finding warranted a Land Use Plan amendment. BLM has suspended oil and gas leasing decisions within the Vermillion Basin pending an RMP review of the existing uses and values. The majority of the Vermillion Basin is current designed “Open” to OHV use.</p> <p>In November 2004 and January 2005 during this planning process, the Colorado Wilderness Network re-submitted information to BLM on the seven CWP units within the Planning Area.”</p>
Wilderness Study Areas	Characterization	3-70		23	<p>Add the following descriptions of the citizen-proposed wilderness areas:</p> <p>Description Summaries of CWP Areas and WSA Additions</p> <p>a. Cold Spring Mountain – A proposed addition of 54,010 acres to the existing 17,682-acre WSA, Cold Spring Mountain is dominated by Limestone Ridge at the eastern end, which drops into Irish Canyon, providing spectacular geological formations and habitat for an array of wildlife. The expanded boundary would encompass ecologically important areas on Cold Spring Mountain as well as scenic canyon walls and riparian habitat in the upper reaches of Beaver Creek canyon and east of Cold Spring Peak. The additions would create a logical topographic and ecological boundary. Also, the new boundary acknowledges the changed circumstances of this area, where former deteriorating grazing improvements have now blended into the area, as documented in the CWP submission.</p> <p>b. Cross Mountain – A proposed addition of 18,027 acres to the existing</p>

				<p>14,081-acre WSA, Cross Mountain provides habitat for big game and for endangered fish in a gorge that also provides excellent opportunities for primitive recreation. There is also extensive evidence of prehistoric human occupation. The additions would maintain topographic continuity on the west side of Cross Mountain and extend a logical boundary to encompass the southern end of mountain area.</p> <p>c. <u>Diamond Breaks</u> – A proposed addition of 42,961 acres to the existing 36,430-acre WSA, Diamond Breaks contains an impressive variety of topography and vegetation, with rugged ridges and peaks covered by pinon juniper broken by open draws and stands of aspen leading ultimately to sagebrush in the valleys. The area also provides critical winter range for deer and elk and habitat for pronghorn and sage grouse. The proposed additions include approximately 1200 acres recommended by BLM for protection in 1991 in order to bring the boundary up to the boundary of the Browns Park National Wildlife Refuge, as well as the south half of Pitt Draw in order to complete the protection given to the north half included in the WSA. A final addition would incorporate a major drainage between Allen and Marshall Draws, which would improve access into Diamond Breaks from the west side.</p> <p>d. <u>Dinosaur Additions</u> – A proposed addition of 57,207 acres to the existing 23,744-acre WSAs (four total), Dinosaur Additions includes roadless areas that share almost 20 miles of boundary with Dinosaur National Monument, providing habitat for deer, elk, pronghorn and mountain lions. The area also makes up the scenic vistas that are viewed from the national monument. The additions would provide critical buffers to protect and enhance habitat and views.</p> <p>e. <u>Vermillion Basin</u> – Vermillion Basin consists of 86,570 acres that hosts rare plant species and communities, a desert canyon surrounded by delicate badlands, and one of the most spectacular collections of petroglyphs found in the State of Colorado. In its own inventory, completed in 2001, BLM found that most of this area had wilderness character.</p> <p>f. <u>Yampa River</u> – This 12,414-acre area includes a wild stretch of river that provides winter habitat for bald eagles and critical winter range for deer and elk, while also providing numerous opportunities for primitive recreation such as rafting, camping, canoeing and hunting. In its own</p>
--	--	--	--	---

					<p>inventory, completed in 2001, BLM found that the Yampa River CWP area had wilderness character.</p> <p>g. Pinyon Ridge –This area contains 20,853 acres that make up one of the very few undeveloped areas of the lower White River drainage and provide habitat for eagles and other raptors to build nests along ridge outcrops and prey on the extensive prairie dog populations. Larger mammals such as deer, coyotes, and mountain lions also inhabit the forested slopes, creating prime hunting opportunities that are enhanced by the scenic vistas and rugged access on overgrown ways, which would be properly limited to foot and horse trails. The area is bounded by jeep trails and oil and gas development, although the steep topography effectively shields the proposed area from the impacts of oil and gas development.</p>
Wild and Scenic Rivers	Characterization	3-72		27	<p>The AMS should clarify whether the RMP will indeed "...inventory and analyze all intermittent and perennial river segments in the RMPPA..." including, for example, Vermillion Creek, Fourmile Creek and Spring Creek or only at the eight segments on the Yampa River or Little Snake River listed in the chart. (We believe the BLM is obliged to look at all intermittent and perennial river segments throughout the planning area).</p> <p>The AMS should state whether the new RMP will redo the Yampa River eligibility study or just proceed with the suitability study.</p>
Current Resource Use Conditions and Trends	Oil and Gas	3-80		1: Footnote 6	<p>We are concerned that the AMS has been prepared prior to completion of the Reasonably Foreseeable Development (RFD) scenario for the LSRA. If the RFD indicates resource levels that are significantly different than those reflected in this document, we fully expect BLM to thoroughly incorporate the new information into its assumptions and assessments regarding energy resources in the LSRA.</p>
Current Resource Use Conditions and Trends	Oil and Gas	3-81		4-6	<p>The Energy Policy and Conservation Act Amendments (EPCA) do not direct the Department of Interior to reassess and modify constraints to oil and gas leasing as these lines state. Rather, it is the Vice President's National Energy Policy Development Group that <i>recommended</i> that the Department make such modifications. This is a critical distinction, as it demonstrates that BLM is not mandated by statute to modify existing constraints on energy leasing. Line 4 should read as follows: "...federal lands. The Vice President's National Energy Policy Development Group has recommended that the Department of the Interior reassess and modify any constraints to oil and gas leasing 'where opportunities exist (consistent with the law, good environmental practice, and balanced use of</p>

					other resources)'. ”
Current Resource Use Conditions and Trends	Oil and Gas: Current Conditions	3-81		16	<p>We are curious why BLM has included this reference to the EPCA Focus Areas that the LSRA includes, but does not make reference in this document to the energy resource data contained in the EPCA Inventory. To the best of our knowledge, the EPCA Inventory is the most recent source of data on energy resources in the LSRA. It seems a substantial oversight that BLM has not made reference to this data, and we fully expect to see EPCA data on the accessible energy resources in the Uinta-Piceance and the Greater Green River Basins reflected in the Draft RMP/EIS (this data is available at http://www.blm.gov/nhp/spotlight/epca/EPCA_fact_sheet_draft06.htm). For example, according to the EPCA Inventory, 94% of all natural gas on federal public lands in the Uinta-Piceance Basin is currently available for leasing. For the Greater Green River Basin, 90% of all natural gas on federal public lands is currently available for leasing.</p> <p>When EPCA data are incorporated into the Draft RMP, estimates of energy resources should distinguish between “technologically recoverable” resources and “economically recoverable” resources.</p>
Current Resource Use Conditions and Trends	Oil and Gas: Current Conditions	3-81		29	<p>These data on leasing levels in the LSRA should specify the number of acres that are currently leased. Additionally, they should indicate how many leased acres and individual leases are under production—in raw numbers and as percentages of the total leased acres and numbers of leases.</p>
Current Resource Use Conditions and Trends	Coalbed Methane: Current Conditions	3-83		1-2: Footnote 8	<p>As with the lack of a completed RFD, we are concerned that the AMS has been prepared prior to completion of an assessment of coalbed methane (CBM) in the LSRA. Should the forthcoming CBM assessment indicate economically-recoverable resource levels that are significantly different than those projected in this document, we expect BLM to thoroughly incorporate the new information into its assumptions and assessments regarding CBM in the LSRA.</p>
Current Resource Use Conditions and Trends	Coalbed Methane: Characterization	3-84		22-25	<p>We encourage BLM to establish resource development requirements for CBM that provide specific and sufficient protections to preserve availability of water and to safeguard water quality in the LSRA.</p>
Current Resource Use Conditions	Coal: Characterization	3-85		36	<p>Despite BLM’s claims to the contrary, the coal suitability analysis prepared for the 1989 RMP is not sufficient for the current RMP revision. These data are 15 years old, and building a management strategy upon such outdated information is not acceptable. BLM must do a new suitability assessment using current technology.</p>

CHRONOLOGY OF EVENTS INVOLVING VERMILLION BASIN

- 6/18/97 BLM releases Final Colorado Wilderness Review Procedures (Instruction Memo CO-97-051).
- 7/97 BLM conducts field review with team of public representatives to determine roadlessness of six areas.
- 10/9/97 BLM issues Draft Roadless Review Summary for six areas – comment period lasts until 10/14/97. In the draft map, Route VR-A-1 is NOT listed as a road (SEE DRAFT MAP).
- 10/14/97 Conservationists submit comments, which among many things, contain our agreement that VR-A-1 is not a road, and disagree with finding that segments at either end of VR-A-1 are “roads” (SEE 10/14/97 COMMENTS).
- 2/5/98 BLM announces final Roadless Review Findings, and announces second phase of public participation process. In its final roadless findings, BLM changed its determination regarding Route VR-A-1 to find that it is actually a “road” along its entire length based on comments from Wright Dickinson (SEE FINAL MAP & ROAD/WAY ANALYSIS FORM).
- 4/9/98 Conservationists comment on second phase, and challenge BLM’s decision on Route VR-A-1. BLM tells us that final road determinations are not appealable. BLM’s Wilderness Review Procedures state that areas not found to be “roadless” are to be dropped from the review process and managed under the existing management plan (SEE 4/9/98 COMMENTS).
- 11/23/98 BLM announces management decisions for the six areas: for Vermillion, BLM decides to conduct a wilderness inventory as part of a process to amend the resource management plan. Due to workload, BLM defers this effort until May of 2000.
- 2/17/99 Rep. DeGette introduces “Colorado Wilderness Act of 1999.” Boundaries for Vermillion Basin were amended before introduction to reflect major findings of the BLM roadless review, but not with contested findings. In the NW corner of Vermillion, the boundary was adjusted to drop out some upland acres closest to the Dickinson Ranch, but proposal still includes the contested Route VR-A-1, including roughly half of the area now proposed for oil and gas leasing.