

Local Government (County LUB) / Agriculture and Ranching Sector Meeting

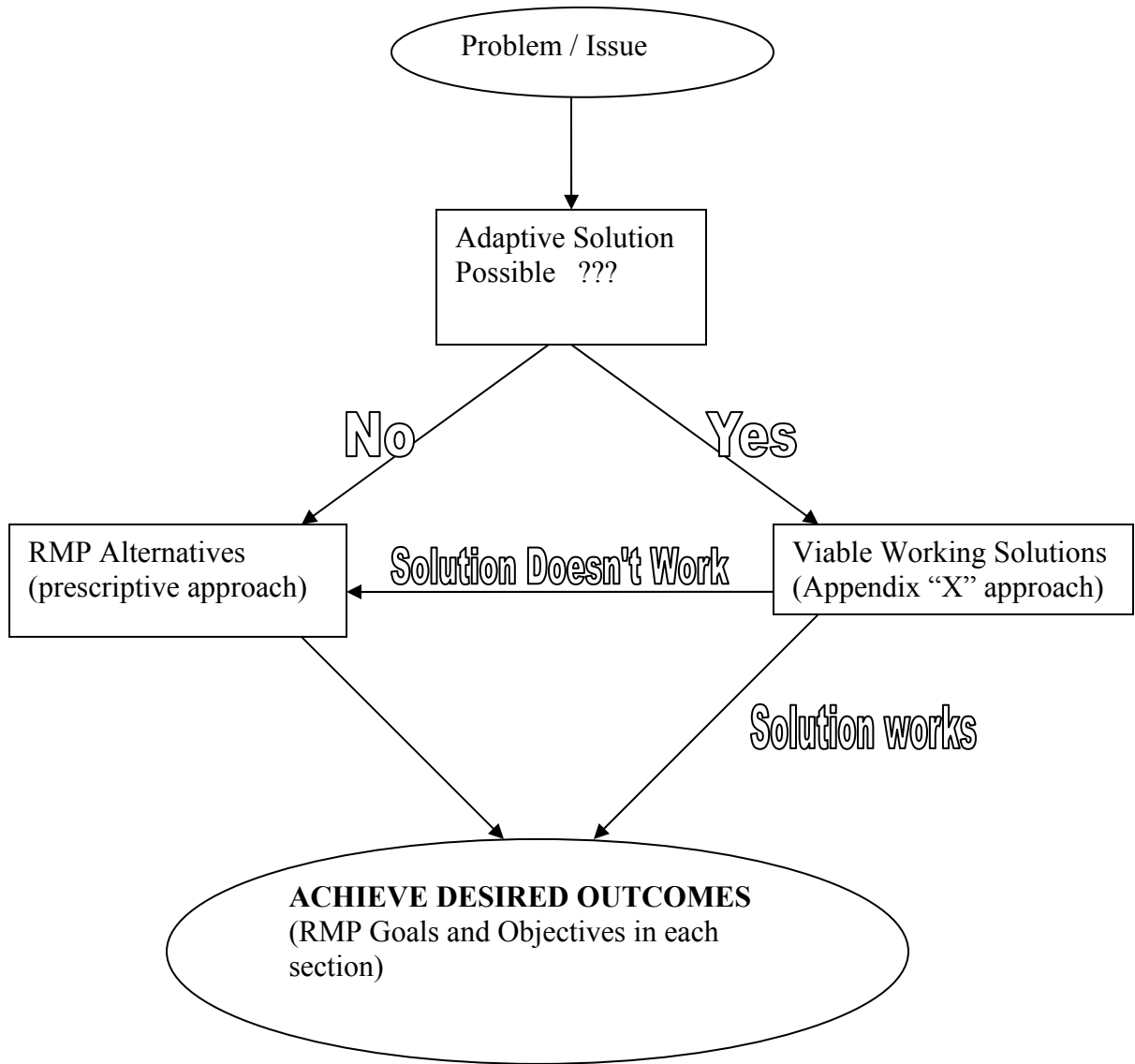
Courthouse Conference Room

Friday October 7, 2005

7am-10:15am

Sector Member	Attended
Jean Stetson	X
Burt Clemments	X
Rick Hammel	X
Ed Winters	
Jeremy Casterson	
Richard Blakely	
Jeff Comstock	X
T. Wright Dickinson	X
Tom Gray	X
Tom Deakins	X
Steve Raftopoulos	X
Marianna Raftopoulos	
Vicki Burns	
Lane Osborn	
Steve Hinkemeyer	X
Dean Gent	X
Mark Voloshin	
Kieth Panky	
Steven Andrews	X
Les Hampton	
Wes McStay	

BLM MANAGEMENT PROPOSAL
by the
Local Government (County LUB) / Agriculture and Ranching Sector
(pictures to be added prior to Oct. 12 NWCOS Meeting)



Appendix “X” Overriding Comments

- 1) Rename Appendix X to “Viable Working Solutions”
- 2) Viable Working Solutions should be the adaptive approach to solve problems. It should also be the first and foremost priority to accomplish desired outcomes in any situation where the RMP references possible exemptions by using Appendix X. Viable Working Solutions are NOT THE EXEMPTION to prescriptive proposals in the RMP. Viable Working Solutions IS THE PRIMARY PREFERENCE. Should a Viable Working Solution not be realized, the secondary option is to default or fall-back to RMP prescriptions.
- 3) The RMP currently reflects the opposite situation described in # 2 above. It places the prescriptive alternatives as the primary approach and then allows for exemptions from the prescriptive alternatives. We recommend the Viable Working Solutions act as primary approaches to management and RMP Alternatives act as a secondary / fallback approach.
- 4) Goals and Objectives listed under each section of the RMP are the Desired Outcomes.
- 5) Viable Working Solutions are the ADAPTIVE Method to accomplish the Outcomes.
- 6) If no Viable Working Solution is possible, then the prescriptive methods described in the RMP Alternatives shall be the default for achieving outcomes.

Suggested Changes to Alternative “C” (or Community Alternative Suggestions)

- p. 1 Fragile Soils A. allow an adaptive option (See Appendix X overriding comments above) for creative methods to protect fragile soils.
- p.7 Goal 2. Delete goal as is, change to assure Old Growth Forest is not an overriding driver for habitat, but rather, the goal should encourage a diversity of habitats consistent with other uses.
- p. 8-9 Vegetation Treatments. Remove # of acres for treatment in each proposed alternative as this says nothing to the effectiveness of ecosystem health. Acres are arbitrary numbers that should only be identified in an Activity Level Plan, not RMP level planning. Alternative C should be changed to manage vegetation treatments and forest treatments to assure local economy does not suffer and balance ecosystem land treatments with the needs of the existing land uses.
- p. 11 Goal F Add “In collaboration with stakeholders” in front of “cooperate with CDOW”. Our concern is CDOW represents a crucial part of wildlife management, but not the entirety of issues that stakeholders should be part of, during issue discussion.
- p. 12 Goal F Objectives #2. Change “Key Agencies” to “Stakeholders”. Our concern is on-the-ground land managers (i.e. ranchers, miners etc.) have more influence on habitat management than even the federal or state agencies, and should therefore be part of all discussions BLM enters into regarding habitat.
- p. Wildlife/Big Game. 14-17 See Appendix X Overriding Comments above.

p. 18-22-Sage Grouse. See Appendix X Overriding Comment above.

p. 20 third bullet under Habitat Reclamation. Allow for non-native grasses and other Best Management Practices to be used as a cover-crop to aid in establishing desired plant communities.

p. 23 Black Footed Ferret, letter I. and P. 25 letter P
“No surface disturbing activities allowed that may significantly alter prairie dog complex” is inconsistent with the Black Footed Ferret Reintroduction Plan which is a basic “live and let live” policy. In addition p. 25 p “rights of way on public land that have potential to disturb occupied Black Footed Ferret habitat will be rerouted to avoid prairie dog towns” is taken out of context from the Black Footed Ferret Plan. Our concern is the Black Footed Ferrets were introduced under section 10J of the Endangered Species Act, which allows for the coexistence of an endangered specie while not overriding existing uses. This language appears to give preference to a species that was introduced to coexist, not override existing uses. We feel the above phrases have been taken out of context with the BFF Plan.

p. 36 BBB. Water Rights. Colorado water law prevents BLM from garnering water through Bypass Flows. This language should be removed.

p. 37 CCC Colorado Cutthroat Trout. See Appendix X Overriding Comments above.

p. 39 LLL Translocation. See Appendix X Overriding Comments above.

p. 47 Objective C. at the end of this sentence, add “...consistent with local fire management plans.” This warrants attention since BLM was critical is helping develop and fund local fire management plans that affect the little snake field office fire management program.

p. 49 Livestock. Goal A. Replace the last few words... “sustain a variety of uses, including livestock grazing” with “use livestock grazing to sustain a variety of uses.” Our concern is this is the livestock section, yet livestock are taking a back seat to other uses. Our suggested wording places livestock grazing as the key to assuring other uses occur.

p. 49 Overarching Goals and Alternatives. There is no reference to “working with permittees” or “collaboration with permittees”. This must be incorporated in all alternatives or a general goal and objective. The sector felt cooperative efforts with permittees was not adequately addressed.

p. 49 Goal B. Add “while increasing forage” to the end of the sentence. The sector felt it was critical that BLM manage to increase livestock forage especially in areas where it has decreased due to decadent sage brush or plant communities.

p. 49. Livestock. Another alternative should be added to protect and enhance the integral tie of public lands to private base properties. The concern is BLM not acknowledging nor managing the public land with the idea that private lands will be sold and subdivided should the tie between the two not be recognized. Not recognizing the integral tie between private base properties and BLM allotments would short-change BLM’s ability to manage wildlife habitat, open space, etc.

p. 49 There is a consistent lack of adaptive management throughout the alternatives in the livestock section. For example no references exist to Appendix X. We recommend adding adaptive management by using the Appendix X Overriding Comments above.

p. 50 letter D. We recommend working with other stakeholders in addition to CDOW. CDOW manages the animal, permittees manage the habitat. Please reflect this in Alt C. In addition we recommend using Appendix X Overriding Comments above.

p. 55-60 Limestone Ridge, Irish Canyon, Lookout Mt., and Cross Mt., are closed to Oil and Gas and surface disturbing activities in Alternative C, the sector felt this was a prescription that doesn't achieve the protection goals. Controlled Surface Occupancy is suggested to assure flexibility to achieve the stated management goals. See Appendix X Overriding Comments above.

p. 71 last phrase of page. Add "oil and gas" before the word "development." It was the sectors concern that pre-development might be construed to mean pre-pipelines, pre-stockdams, pre-bird guzzlers, or pre-livestock improvements.

p. 77 Visual Resource Management Areas. We recommend that the language in Alternative C, allow for the exemptions/exceptions waiver for VRM classes that many other sections of the RMP allow. This will allow a land manager to meet the goals and objectives for VRM's when adaptive proposals are submitted. See Appendix X Overriding Comments above.

p. 79-82 Cultural Resource Surveys, Alternative C must provide for "block release methodology" to be developed. This will allow BLM to permit land uses in areas where adequate archeology samples exist, and it is deemed site information does not contribute additional information to the knowledge or cultural base. The intent is to prevent a flint-chip from halting progress of land management projects that improve ecosystem health and management opportunities.

p. 86 Social and Economic Values. Add a #5 in Alternative B (which is referenced in C) that acknowledges the integral tie livestock grazing and surface mining have on public lands and private base properties which contribute to open space and landscape level habitat management.

p. 138-138 Alternative B bottom of p. 138, top of p.139. The sector desires to add language to Alternative C that is currently in B, stating "acquisition land tenure adjustment actions will be allowed on lands that meet the following criteria: help block up existing BLM land, lands near communities that provide open space and preserve agriculture, protect wildlife, protect the environment, enhance recreation opportunities and generally serve the public good, block up lands that would provide public access to public lands or other public assets such as but not limited to river access.

p. 143 Communication Sites. The sector recommends alternative C be the same as alternative A, plus allowing for increased communication abilities. The recommendation for alternative C should read, " Review communication site proposals on a case-by-case basis and reasonably facilitate BLM lands to increase communications abilities. Our concern lies in the fact that as population growth and emergency management needs increase, communication tower needs will also increase, and BLM lands are a logical place to accommodate such needs.