

Northwest Colorado Stewardship Sector Concerns Worksheet

Sector Convener: Suzanne Jones

Sector: Wilderness and non-motorized recreation

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STEP 1: Please list the concerns that your sector has with Alternative C on the lines below:

Major issues:

- Lacks protection for wilderness character throughout the resource area in the citizen-proposed areas (including the existing Wilderness Study Areas).
- Fails to provide adequate quiet backcountry recreation opportunities.
- Fails to provide adequate protections for Areas of Critical Environmental Concern, providing protections and designation for only one ACEC out of a total of 15 in Alternative D.
- Stops short of protecting all “suitable” wild and scenic river segments.
- Provides inadequate and uncertain protections for habitat through its reliance on Appendix X and failure to provide long-term habitat protection (relies solely on single season timing limitations in many cases). These concerns are particularly troublesome in the greater sage grouse and big game habitat sections.
- Fails to provide proactive inventory protocol or protections for archeological resources.
- Does not include adequate protections for fragile soils or steep slopes or clearly define “performance objectives” for development in these areas.
- Overall direction of Alternative C is that it starts from the assumption that areas are “open” for energy exploration and development, for OHV use, and for construction of utility corridors leaving the majority of the resource area open to heavy industrial development.
- Many of these overall issues we see with Alternative C likely stem from the failure to create a clear vision for the national lands within the Little Snake Resource Area acting as a central guidepost for management decisions. BLM, with NWCOS, should create a proactive vision for the landscape that anticipates future uses and emerging trends, while safeguarding the rare, unique and wild lands.

STEP 2: From the above list, please identify your TOP THREE concerns.

1. Failure to Protect Proposed Wilderness Areas: Alternative C fails to protect the wilderness character of the seven proposed Citizen-Proposed Wilderness Areas by adopting protective management prescriptions and/or designations. Specifically, Alternative C allows recreational OHV use, allows oil and gas exploration and development, allows exceptions for development of wind energy and calls for “avoidance” but not “exclusion” for rights-of-ways in many proposed wilderness lands (which include both Wilderness Study Areas (WSAs) as well as other “Lands with Wilderness Character Outside of WSAs”).

2. Failure to Provide for Quiet Backcountry Recreation Opportunities: Alternative C fails to provide for a balanced array of recreational uses. Very few places in the LSRA are set aside for quiet recreational uses or closed to OHV recreational use; only two areas (Diamond Breaks and Cross Mountain) are designated for backcountry/wilderness-type recreation experiences.

3. Failure to Protect Existing or New Areas of Critical Environmental Concerns (ACECs): Alternative C eliminates ACEC status for three existing ACECs (Lookout Mountain, Limestone Ridge, and Cross Mountain WSA) and fails to designate any new ACECs --- for wilderness character, for white-tailed prairie dogs, for sage grouse, or for rare plant species and communities.

WORKSHEET: PRIORITY #1

The general topic of this issue is: Protection of Proposed Wilderness Lands (which include both Wilderness Study Areas (WSAs) as well as other “Lands with Wilderness Character Outside of WSAs”).

Our interest regarding this issue is ensuring that a portion of the wild public landscape within the Little Snake Resource Area is protected in its current wild state in perpetuity (or at least for the life of this plan) for the many public benefits that protecting wildness provides including habitat for wildlife and rare & imperiled species, primitive backcountry recreation opportunities, maintaining the rural culture and western heritage, for watershed protection, and for maintaining the pristine condition of the land itself for future generations to enjoy. We feel this is particularly important given the increase in off-road vehicle use, energy exploration and development, and private land development that is projected for the LSRA over the next 20 years, making remaining wildlands all the more precious and important to protect.

We are concerned about the following items:

Wilderness Study Areas:

- Under Wilderness Study Areas in Alternative C on page 63, which says the West Cold Spring WSA would be “OHV – Limited (apply adaptive criteria)” and “Lands and Realty: ROW – Avoidance; accept wind energy applications on case-by-case basis”; see page 104, 142
- Under Wilderness Study Areas in Alternative C on page 64, which says the Ant Hills, Chew Winter Camp, Peterson Draw, and Vale of Tears WSAs would be “OHV – Limited (apply adaptive criteria)” and “Lands and Realty: ROW – Avoidance”; see page 104,

Lands with Wilderness Character Outside Existing WSAs:

- Under Lands with Wilderness Character Outside Existing WSAs in Alternative C on page 71 for Vermillion Basin, which says in Zone 1 (Northern Zone of High and Medium potential) “allow for oil and gas leasing, exploration, and development . . .” and “Open to new oil and gas leasing with a Controlled Surface Use stipulation”; “OHV: Limited to Designated Routes”; “VRM: Class III . . .”; “Lands and Realty: Case-by-case basis, avoidance for Vermillion Bluffs and fragile soil areas?”.
- Under Lands with Wilderness Character Outside Existing WSAs in Alternative C on page 73 for Vermillion Basin in Zone 2 (Southwest area of Low and No Known potential) “OHV: The portion of Vermillion basin south and east of Ted’s Draw will be Limited to Designated Routes”.
- Under Lands with Wilderness Character Outside Existing WSAs in Alternative C on page 74 for Dinosaur North, which says “OHV; Limited to Designated Routes” and “Lands and Realty: ROW – avoidance”.
- Under Lands with Wilderness Character Outside Existing WSAs in Alternative C on page 74 for Cold Springs Mountain, which says “OHV: Limited to designated routes” and “Lands and Realty: ROW – avoidance; accept wind energy applications on case-by-case basis.”

- “Under Lands with Wilderness Character Outside Existing WSAs in Alternative C on page 75 for Cross Mountain Area, which says “Same as Alternative A”. [In other words, no protections for the area.]
- “Under Lands with Wilderness Character Outside Existing WSAs in Alternative C on page 75 for Diamond Breaks Area, which says “Same as Alternative A”. [In other words, no protections for the area.]
- “Under Lands with Wilderness Character Outside Existing WSAs in Alternative C on page 76 for Pinyon Ridge Area, which says “Same as Alternative A”. [In other words, no protections for the area.]
- “Under Lands with Wilderness Character Outside Existing WSAs in Alternative C on page for Cold Spring Mountain , which says “Same as Alternative A”. [In other words, no protections for the area.]
- Yampa River (outside SRMA) [not listed-unclear if expansions on SRMA would include these “backcountry” additions], no protections from energy development or mining, OHV managed for existing trails under adaptive criteria.
- Yampa River SRMA OHV “limited to designate routes” p. 109.
- Under “exclusion” areas for ROW, p. 141, should list all areas with wilderness character (citizen-proposed) or “backcountry”
- Under “closed” area for OHV, p 102-103, should list all areas with wilderness character (citizen-proposed) or “backcountry,”
- Under “closed” area for fluid, coal, locatable, saleable, etc., all areas with wilderness character (citizen-proposed) or “backcountry”

This item is problematic for our interests because in order to protect the wilderness character of proposed wilderness lands, we believe these areas must be closed to motorized use (except for emergency, administrative or livestock permittee use), to all oil and gas exploration and development, to wind energy facilities, and to new right of ways in order to preserve the wild and undeveloped nature of the landscape. It is important that these proposed wilderness areas be closed to all recreational ORV use in order to allow for areas for visitors and residents to have places to experience quiet, non-motorized and non-mechanized recreation, and because history has shown that attempts to limit OHV use to designated trails without adequate law enforcement often leads to the creation of new user-created spurs and routes, especially in more open landscapes.

Suzanne Jones and Reed Morris, members of our sector, are heading up our efforts to craft a solution to this problem. Our initial thinking about a solution is that in coming up with a joint management vision for the LSRA area, NWCOS should ensure that there is a balance of uses across the LSRA landscape to provide for a diversity of appropriate uses allowed for under FLPMA in a manner that preserves the health and sustainability of the land, water, vegetation, native species, and overall ecosystem health. Under the existing Little Snake Resource Management Plan, currently 79% of the LSRA is zoned to allow OHV use (under “open” and “limited” designations; only two WSAs are actually closed to OHV use) and 1,900,530 acres of the LSRA mineral estate is open to oil and gas development (only 92,087 acres within WSAs are closed; plus ~80,000 acres Vermillion Basin under a temporary withdrawal). Currently, only 92,087 acres within the LSRA are protected as Wilderness Study Areas, and the LSRA has zero

acres of designated wilderness. Protecting the seven proposed wilderness areas within the LSRA, totaling ~272,239 acres, would still leave some 79% of the LSRA open to OHV use and 88% open to oil and gas development, and provide for a better balance of uses across the LSRA as required by law, as desired by many public interest sectors, and in the best interest of a diversified local and regional economy. The BLM is also obligated in this plan revision to improve this current disparity within these multiple uses.

Nonetheless, to offset these perceived losses to OHV interests (though many proposed wilderness areas receive little to no OHV use), we propose that more emphasis and agency resources be slated for providing and maintaining quality OHV recreational experiences in concentrated areas as appropriate to the landscape and other public resources. For example, we believe that portions of Sandwash Basin would be appropriate for such intensive OHV use.

Given that there are few to no existing leases within most of the seven proposed wilderness areas (except for Pinyon Ridge) and that most of the proposed areas are located within “low potential” oil and gas areas on BLM’s estimated energy map, there will be little to no impact on the oil and gas industry in placing a relatively small amount of acreage within the LSRA off-limits to energy development. The one proposed wilderness area located within BLM’s “medium” to “high” potential oil and gas zone is Vermillion Basin. A recent report by The Wilderness Study based on U.S.G.S. data estimated that Vermillion Basin contains only 5% of the oil and gas resources within the LSRA; protecting this Basin would still potentially leave available some 95% of oil and gas resources (further analysis is needed to understand what percentage of these resources are available under private lands within the LSRA boundaries). Further, a large percentage of the medium to high potential lands within the LSRA have already been leased for oil and gas development but have only seen modest development to date; high energy prices may likely lead to the drilling of these lands during the life of the plan, however, there is clearly many, many years’ worth of energy development that can be pursued under existing leases even if no other lands are leased under the new RMP. We are willing to explore options the oil and gas industry have raised to facilitate energy development within the LSRA on existing leases and new leases in a manner that reduces surface disturbance (especially in key wildlife and imperiled species habitat) while addressing some of the needs of the energy industry. We believe that such collaboration can occur while preserving proposed wilderness areas and offsetting the withdrawal additional areas from energy development (such as the Vermillion Basin)

This solution has been tried in other planning processes on both BLM and National Forest lands around the West. For example, the recently revised White River National Forest plan (while we have other problems with this plan) recommended wilderness while also allowing energy development. Another recent area that was withdrawn from development while balancing wild areas was the Rocky Mountain Front

WORKSHEET: PRIORITY #2

The general topic of this issue is Non-Motorized Recreation.

Our interest regarding this issue is preservation of quiet, non-motorized, backcountry and wilderness-type recreation opportunities within the Little Snake Resource Area.

We are concerned about the item in Rows 1 and 2 on page 103 of the Alternatives Document, which says BLM is managing the vast majority of the resource area, including most of the lands proposed for wilderness protection, as open to motorized recreation (either “designated trails” or “limited to existing trails”). Only the Diamond Breaks WSA, Cross Mountain WSA, and the southwestern corner of the Vermillion Basin are “closed” to motorized travel. (In another location in the alternatives document it is indicated that fly creek and a portion of serviceberry are also “closed”). BLM’s reliance on Appendix XX provides little specificity on when travel management plans should be initiated, and leaving these decisions to later “triggers” and eventual budget limitations for planning could mean that bringing a balance of recreation opportunities will never come to fruition.

Citizens Wilderness Proposal Areas open to motorized and mechanized

- Vermillion Basin “zone 1” and a part of “zone 2”
- Diamond Breaks area outside the WSA
- Cross Mountain area outside the WSA
- Cold Spring Mountain including the WSA
- Dinosaur North including the four WSAs
- Pinyon Ridge area
- Yampa River area, both inside and outside the SRMA

No additional areas have been identified in the plan to manage for quiet, non-motorized recreation opportunities in Alternative C.

This item is problematic for our interests because Alternative C fails to provide for opportunities for quiet, non-motorized recreation across the resource area. The WSAs and CWPs have been stated by BLM as being their targeted areas for development of more structured non-motorized recreation opportunities. That is missing in Alternative C. It has been offered that places like Four Mile Creek/Serviceberry; various washes and draws around Douglas Mountain, including Conway Draw; BLM land around Middle Mountain and Diamond Mountain (far NW corner) can be utilized as quiet recreation areas. Given that there will be many hundreds of miles of OHV trails in places like Sandwash, Powder Wash, and Hiawatha, it is appropriate to have a stronger commitment to non-motorized, quiet recreation, across the resource area, starting with the RMP. In general, the conservation community is opposed to “open” areas (to cross-country travel) that lead to resource damage bad practices that often proliferate into other areas. We are also concerned to the seemingly expansive areas that BLM leaves “open” to cross-country travel in Sandwash and Hiawatha as moving away from the motorized recreation community’s commitment to “Stay The Trail” and jeopardizing other areas facing the proliferation of trails. In general, we feel the entire resource area, in areas where OHV is appropriate, should move to a

comprehensive designated trail system which will not be accomplished through Appendix XX and the expansive areas that remain “open” and “limited” in Alternative C.

Steve Benowski and Luke Schafer, members of our sector, are heading up our efforts to craft a solution to this problem. Our initial thinking about a solution is that this plan designates areas that will be managed for quiet, non-motorized recreation opportunities that are closed to OHVs and actively and collaboratively develop a resource-area wide Recreation Plan to be implemented at the signing of the ROD. While we feel that BLM’s beginning to develop a travel management methodology through Appendix XX is a step in the right direction, its shortcomings in specificity and identification of “triggers” in begin travel management processes does not provide enough protections for non-motorized recreation opportunities (or other resources). BLM should prioritize and set a clear timeline for travel planning in this RMP, starting with those areas identified to add additional quiet and backcountry recreation opportunities within the resource area.

Through the collaborative creation of a recreation plan, the RMP can first and foremost designate areas or trails that are closed to OHV and areas that are open to motorized travel on designated trails. Additionally, the collaborative creation of a Recreation Plan will allow for multiple recreation uses to be spread across the entire landscape, balancing areas highlighted for their backcountry experiences (e.g. Cold Spring Mountain) with areas that are heavily utilized for motorized recreation (e.g. the proposed Sandwash SRMA). A small portion of southern Sandwash has seen this intensive use. However, the proposed acreage for the open area is far too large to be justified by the historical usage of the area.

WORKSHEET: PRIORITY #3

The general topic of this issue is Areas of Critical Environmental Concern and other places of special, unique and sensitive resources.

Our interest regarding this issue is preservation of rare, unique and sensitive resources within the Little Snake Resource Area, including places of historical (both natural and cultural) significance.

We are concerned about the item in Row 1 on page 54 and Row 1 on Page 59 of the Alternatives Document, which says BLM is removing ACEC designations for three (out of four) existing ACECs and does not provide protections for any new ACECs through special designation or any form of special management for resources found to meet relevance and importance criteria.

ACEC designations removed from existing RMP

- Limestone Ridge
- Lookout Mountain
- Cross Mountain

Currently there are eleven “new” ACECs recognized as meeting relevance and importance criteria in the 9/30/05 alternative shell (ten Natural Systems ACECs and the WTPD ACEC). None are carried into Alternative C.

This item is problematic for our interests because Alternative C fails to recognize or propose special management for any new areas of critical importance within the LSRA. The public nominated a plethora of examples of areas having unique importance. The State of Colorado Natural Areas Program, the Colorado Natural Heritage Program, and the U.S. Fish and Wildlife Service recognize several of these areas as having unique importance. Alternative C also removes the designation of three existing ACECs despite recognizing the need for continued special management. Most troubling is that the ten areas BLM recognizes as potential Natural Systems ACECs (ranging in size from 14 to 5,755 acres), none are provided any special management, let alone designation as ACEC, in Alternative C. The decision not to provide additional site-specific management, monitoring, or special designation could lead to the degradation and eventual loss of these resource values over time where BLM fails to give these area special treatment or management priority. We feel that the decision not to provide such protections in Alternative C violates FLMPA’s clear mandate to give “priority” to the designation and protection of these area. In addition, if the BLM now finds all their existing ACECs to not meet the relevance and importance criteria, this begs the question as to whether management of those ACECs was inadequate and resources were allowed to degrade to a condition where they no longer qualified as relevant or important for conservation.

Josh Pollock, a member of our sector, is heading up our efforts to craft a solution to this problem. Our initial thinking about a solution is that in addition to designating the existing and new ACECs recognized in this RMP, BLM should go further and develop site-specific management plan for each ACEC. We believe that this would accomplish the dual goals of identifying and providing management protections for these areas while also providing an opportunity to address

uncertainties (particularly from the energy and ranching sectors) related to how unspecified ACEC management will play out in the future. While some folks have raised philosophical objections to the designation of ACECs, we feel strongly that BLM has a mandate to do so and that through designation the development of site-specific management plans can proceed and garner the proper level of attention from the agency.

BLM and NWCOS should embrace the opportunity to highlight special resource protections, including the use of adaptive management, for these critically important resources. Collaboration on a site-specific management plan outlined in this RMP would highlight identification and protection of these resources while balancing multiple uses and addressing some of the concerns related to uncertainty of ACEC-management that have been raised in NWCOS.

This solution has been tried in...

The White River Field Office established numerous ACECs such as those Little Snake has identified in this plan. The WRFO 1997 RMP designated seventeen ACECs to protect a variety of resources in this relatively recent Colorado plan revision. Site-specific management plans for ACECs have been identified in several Resource Areas, including those managed by the Grand Junction and White River Field Offices (e.g the "Activity Plans" for the Pyramid Rock, Badger Wash, and Rough Canon ACECs in the Grand Junction F.O. and the Raven Ridge ACEC in the White River F.O.). In fact, in the case of the Grand Junction Field Office's ACECs, the management plan and EA for all three areas was completed together, thus simplifying and expediting the process of adopting these plans. We recommend such an approach for the Little Snake Field Office's ACECs that would be designated for similar reasons (such as the eleven rare plant community ACECs) and therefore would have similar management prescriptions.