

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”).

Our proposal/priority #1 remains essentially unchanged:

Wilderness character within the seven Citizen-Proposed Wilderness Areas should receive protective management prescriptions and/or designations. The seven Citizen-Proposed Wilderness Areas total roughly 270,000 acres of BLM land (which would amount to approximately 14% of the 1.9 million acres of mineral estate and 20% of the 1.3 million acres of BLM administered surface lands).

Some Supporting Data:

- Amount of designated BLM wilderness in the Little Snake Resource Area: None
- 95% of the technically available oil and gas resources within the little snake resource area fall outside the seven Citizen-Proposed Wilderness area .
- All seven of the Citizen-Proposed Wilderness areas are open, in some form, to OHV, utility corridors or other realty actions, or oil and gas or other mining. See October 12 presentation.
- Only two of the Citizen-Proposed Wilderness areas—Diamond Breaks and Cross Mountain WSAs—are managed for quiet, backcountry recreation (non-motorized), though the CWP additions to these areas are not.
- For the most highly used areas for OHV recreation—Sandwash Basin—Alternative C has no change in amount of existing OHV access.

Some Opposing Data:

- 20% (guess estimate) of the resource area would be closed to motorized/mechanized travel
- 5% of the technically available oil and gas resource would be unavailable because of protections to the Citizen-Proposed Wilderness areas.
- 20% of the resource area would be closed to utility corridors, cell phone towers, wind turbines, etc.

Other Places Where This Has Been Successfully Implemented:

On Friday of last week (November 25, 2005), BLM and National Park Service released the Arizona Strip Draft Plan DEIS. The preferred alternative would provide management of lands to maintain wilderness characteristics. The Executive Summary of the draft plan states:

Areas with wilderness characteristics (naturalness, solitude, and outstanding opportunities for primitive and unconfined recreation)

presently occur on the Arizona Strip. The BLM and NPS may maintain or enhance these areas, where they exist. Following recent BLM guidance for assessing and maintaining areas having wilderness characteristics, the BLM and NPS have proposed various options for where, how, and how much these characteristics may be managed within the Planning Area. Only Congress has the authority to designate new wilderness areas.

ES-3. Arizona Strip Draft Plan DEIS. The Arizona Strip District includes the BLM Arizona Strip Field Office (Arizona Strip FO), Vermilion Cliffs National Monument (Vermilion), and BLM portion of Grand Canyon-Parashant National Monument (Parashant). This Draft RMP would direct management for all three jurisdictions. “Lands Managed to Maintain Wilderness Characteristics” for all three are outlined in the tables below, including the BLM Arizona Strip FO (Table 13). Alternative E is the preferred alternative. There are 265,869-acers of designated wilderness in the planning area.

Table 4: Parashant Lands Managed to Maintain Wilderness Characteristics (LUP decisions)

Area	Alternative A No Action	Alternative B	Alternative C	Alternative D	Alternative E Preferred
Lands to be Managed to Maintain Wilderness Characteristics	NA	411,256 acres	226,394 acres	140,949 acres	210,564 acres

Table 9: Vermilion Lands Managed to Maintain Wilderness Characteristics (LUP decisions)

Area	Alternative A No Action	Alternative B	Alternative C	Alternative D	Alternative E Preferred
Lands to be Managed to Maintain Wilderness Characteristics	NA	96,796 acres	40,345 acres	0 acres	36,018 acres

Table 13: Arizona Strip FO Lands Managed to Maintain Wilderness Characteristics (LUP decisions)

Area	Alternative A No Action	Alternative B	Alternative C	Alternative D	Alternative E Preferred
Lands to be Managed to Maintain Wilderness Characteristics	NA	46,135 acres	77,575 acres*	34,628 acres	34,415 acres
More lands managed to maintain wilderness characteristics are recommended in Alternative C than Alternative B because ACECs provide protection under Alternative B, while less ACEC acreage under Alternative C resulted in a recommendation for more lands to be managed to maintain wilderness characteristics.					

Person Who Will Present This To NWCOS: Suzanne Jones

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.

Our proposal/priority #2 remains essentially unchanged:

Management should provide for quiet backcountry recreation opportunities beyond Diamond Breaks and Cross Mountain (though Serviceberry and Fly Creek areas appear to have some protections as well). Areas proposed in addition to the CWP (see Luke Schafer comments on July 15 alternatives) include: Limestone Ridge, The Yampa Trail, Cedar Mountain, Four Mile Creek/Serviceberry Mountain, areas in Pole, Thornburgh, and Dry Gulchs, Various draws and gulches in the Powderwash and Sandwash Basin areas, Douglas Mountain, Conway Draw, Middle Mountain, Diamond Peak. We proposed sitting down with the OHV community and looking at some of these areas collaboratively.

Some Supporting Data:

- Number of areas outside Diamond Breaks and Cross Mountain identified and managed for quiet, backcountry experiences: NONE (however, we are looking into the management for Serviceberry and Fly Creek)
- Only two areas are currently managed for quiet, backcountry recreation opportunities.
- 100% of the existing OHV access in the Sandwash Basin (outside the Vermillion Basin) is maintained.

Some Opposing Data:

- 20% (guess estimate) of the resource area would closed to motorized/mechanized travel, plus additional trails and smaller areas scattered across the resource area identified for non-motorized use.

Other Places Where This Has Been Successfully Implemented:

- The new BLM planning handbook provides a host of tools (new types of SRMAs, etc.) to manage for these areas. No RMPs in Colorado have been revised and utilized these new tools.

Person Who Will Present This To NWCOS: Suzanne Jones or Steve Bonowski

3. Failure to Protect Existing or New Areas of Critical Environmental Concerns:

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.

The term “areas of critical environmental concern” means areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards. FLPMA §103.

Our REVISED proposal/priority #3 is:

In the development and revision of this RMP, BLM must *give priority* to the designation and protection of areas of critical environmental concern. FLPMA §202. Management plans for each ACEC should be developed during the RMP revision process. We are willing to forgo pushing for ACEC designation in some areas, provided that proper management prescriptions (including some NSO) are in place. (see exchange document)

Supporting Data:

- Number of designated ACECs: ONE
- Total of ACECs BLM has already determined meet “relevance” and “importance” criteria: FIFTEEN
- Number of new ACECs BLM has already determined meet “relevance” and “importance” that receive any management at all in Alternative C: ONE (WTPD, through a stipulation that at least one sector seeks to have removed)
- Many of these areas are small, in areas of “low” oil and gas potential areas (e.g. Gibbons Beardtounge ACEC), are topographically unavailable to OHV (e.g. Limestone Ridge, ACEC), or fall within areas that might otherwise be off limits to these uses anyway (e.g. G-Gap ACEC in Vermillion Basin and the Cross Canyon ACEC within the Cross Mountain WSA).

Opposing Data:

- Some areas would be NSO for oil and gas development. This could bring short-term financial burdens to the oil and gas industry.

Other Places Where This Has Been Successfully Implemented:

- White River Resource Area: in the most recent RMP revision a total of seventeen ACECs were designated, most to protect rare and sensitive plant populations. The White River Resource Area also developed management plans for each ACEC. Finally, in a recent proposal for a 1,000-acre well field in the WRRRA, BLM stated that development alternatives would consider alternatives that would protect two ACECs—designated to protect listed plant populations—within the project area. The operator (Exxon Mobile) has proposed to use directional drilling.

Person Who Will Present This To NWCOS: Reed Morris