



COLORADO WILD PUBLIC LANDS

November 1, 2018

Colorado River Valley Field Office
Bureau of Land Management
2300 River Frontage Road
Silt, CO 81652

Via email to: blm_co_sutey_haines_rmpa@blm.gov

To BLM Staff:

Thank you for the opportunity to comment on the Sutey Ranch and Haines Parcel Preliminary Environmental Assessment & Resource Management Plan Amendment. We appreciate the BLM's (Agency's) analysis of three alternatives for the Sutey Ranch property.

We were disappointed that the individual public comments were not made available to the public as part of the Environmental Assessment and/or posted on the website. We have requested to BLM staff at the open house on October 25, to please make those available as soon as possible.

We would like to again note the agency's past statements on the importance of this management planning in supporting its Finding of No Significant Impact on the Sutey Ranch land exchange. The Record of Decision cites the importance of wildlife habitat in the decision to enact the land exchange:

"The Non-Federal lands contain valuable big game winter habitat and water rights allowing for the long-term protection and enhancement of natural resources."

And the Final Environmental Analysis relies on this management planning process to mitigate impacts from the proposed land exchange:

"Specifically, CPW would be consulted . . . in the process. Although the plan is only conceptual at this time, it is reasonable to assume it would address protection and management of habitats for wildlife species and facilitate management of these lands in a manner that will promote the achievement of the Public Land Health Standards." [FEA 3-95]

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We support the direction of the Agency's preferred Alternative 1 (Wildlife and Hunting Emphasis). Wildlife should be the primary beneficiary of this planning process and recreation a secondary consideration. Since the Sutey Parcel was exchanged as mitigation for the BLM's loss of valuable wildlife habitat and hunting lands at the base of Mount Sopris, it is critical that protection and enhancement of wildlife habitat is the focus of management for this parcel.

Below are some specific recommendations and comments on the Environmental Assessment, primarily for the Sutey Parcel, for consideration as this process moves forward.

WILDLIFE

- Ongoing coordination with CPW should be a priority goal of management planning.
- Ongoing management should include detailed and transparent biological studies; they should be recent, current and be updated periodically.
- Hunting is proposed as a use on the Sutey Parcel. Anecdotal evidence from local hunters and neighbors indicates that the once large elk herd has almost disappeared from the area. Further studies of elk and deer population on the property should occur and a hunting management plan should be developed.
- Seasonal closures are proposed and it is critical that those are enforced. There should be restrictions on dogs on the property.

WATER RIGHTS ON SUTEY RANCH

- Per the Agency's preferred Alternative 1, we support the Agency's plans to continue historic irrigation on the property.
- Per the Open House, we understand the Agency is studying alternatives for implementation of the irrigation plan. These include a hiring a seasonal intern or working with a group of neighboring property owners. The irrigation management plan should be transparent and available to the Public.
- The property is proposed as a Reserve Grazing Area. We understand grazing may be implemented as a vegetation management technique to benefit wildlife. If the property is used to relieve grazing pressure elsewhere, the grazing should not have a negative impact on the Sutey Ranch.
- We recommend that there be a transparent process for allocating grazing rights and that an annual public report on grazing usage of the property is prepared and readily available.

RECREATION

- We support the Agency's preferred Alternative 1 in which the Sutey Ranch will not be managed as an SRMA and prioritizes wildlife needs over recreation.
- Alternative 1 proposes only one mechanized trail that will be open at specific times of the year. The trail should be located to minimize impacts to wildlife and as well as to minimize opportunities for the creation of additional bandit trails or mechanized use. It should serve primarily as a connection to access existing trails on other parcels on Red Hill.

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- Use of this parcel should be considered as an alternate portal to Red Hill, not as a stand-alone new recreation area; limit parking on this side and improve parking and facilities at Red Hill.
- While not designated as an SRMA, the Sutey Parcel will need a clear management plan for human use of the property. This may include the opportunity to visit the historic ranch site; use of foot trails and the one mechanized trail, and enforcement of closure periods.
- We support the management plan for the Haines Parcel in not allowing camping. Fees for use of the area and/or nearby camping areas should be considered to help with management costs.

GENERAL MANAGEMENT COMMENTS

- There should be clear delineation of property boundaries and direction to users about where to go.
- Management and enforcement should prioritize wildlife protection.
- A fairly complex set of closures is proposed. The closures should be clearly communicated to the Public and enforced by personnel.
- Include strategies to watch for and shut down bandit trail building.
- Maintain a presence on the properties; if people see rangers there, they will be more respectful of rules and boundaries.
- Planning and management should be revisited and revised periodically (5-10 years).
- There are many historic ranch structures remaining on the property, presenting opportunities for restoration and interpretation. A ranch/cultural resource management plan should be developed and made available to the Public for input.
- Manage the parking area to prevent overflow.

We appreciate the opportunity to comment on this environmental assessment and management planning process and hope the Agency will provide further well-publicized opportunities to comment on additional planning efforts.

Thank you for your consideration.

Sincerely,

Colorado Wild Public Lands Board of Directors:
 Franz Froelicher, Jean Perry, Anne Rickenbaugh, Hawk Greenway
 and James Katzenberger

This letter is submitted via email and certified mail

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