

Concerns over Draft Red Cliffs NCA Resource Management Plan

November 24, 2015

Presented to Washington County HCAC by County
Commissioner Alan Gardner



Land Acquisition: What the 1999 RMP and Alternative A Contain

- BLM will acquire selected lands. (The 1999 plan includes a map showing all of the HCP inholdings as acquisition lands.)
- Most acquisitions will occur through exchanges.
- BLM's acquisition commitment from HCP Implementation Agreement is specifically mentioned.



Land Acquisition: What RMP Alternatives B, C, and D Contain

- Generic language that is also used for Beaver Dam Wash NCA.
- No targeted lands to acquire—just the possibility of acquiring “in-holdings and edge-holdings.”
- No emphasis on exchanges.
- No reference to the HCP or BLM’s commitment to acquire inholdings.



Land Acquisition: Conclusion

- The final RMP needs to:
 - Acknowledge BLM's commitment to acquire the private and SITLA owned lands in the Red Cliffs Desert Reserve,
 - Identify those lands for acquisition, and
 - Identify exchanges as the primary means of acquisition.



Utility Development Protocols

- The HCP documents include utility development protocols that require the Red Cliffs Desert Reserve to be managed as an avoidance area for right of ways and prescribe rules for the development and maintenance of utility and water infrastructure.
- OPLMA (Lands Bill) states that utilities in the Red Cliffs NCA may be developed if “carried out in accordance with (1) each utility development protocol described in the habitat conservation plan; and (2) any other applicable law.”



Utility Development Protocols in the RMP

- The RMP, however, states the UDPs are insufficient because they do “not address the mitigation of development impacts on the many other resource values that Congress identified for conservation, protection, and enhancement.” (Page 32.)
- The UDPs not referenced in Alternatives B, C, or D. (See, for example page 284.)



Utility Development Protocols Conclusion

- The final RMP needs be in accordance with the Utility Development Protocols rather than dismiss them.



Omission of Language Discussing Coordination with Washington County

- For 20 years, the County (in part through the HCAC) and the BLM have worked cooperatively to manage public and private lands in the Red Cliffs Desert Reserve.
- The 1999 RMP acknowledges this important relationship.
- Alternatives B, C, and D entirely fail to acknowledge this relationship.



Examples

- ▶ Washington County, the HCP, or HCAC are not Mentioned in the following:
 - ▶ Desert Tortoise Objectives and Management Actions (page 214),
 - ▶ Special Status Species Management Actions (page 209), and
 - ▶ Water Resource Objectives and Management Actions (pages 178-179).



Coordination Conclusion

- The final RMP should state that BLM will work cooperatively with Washington County in carrying out management actions that are consistent with the HCP documents.

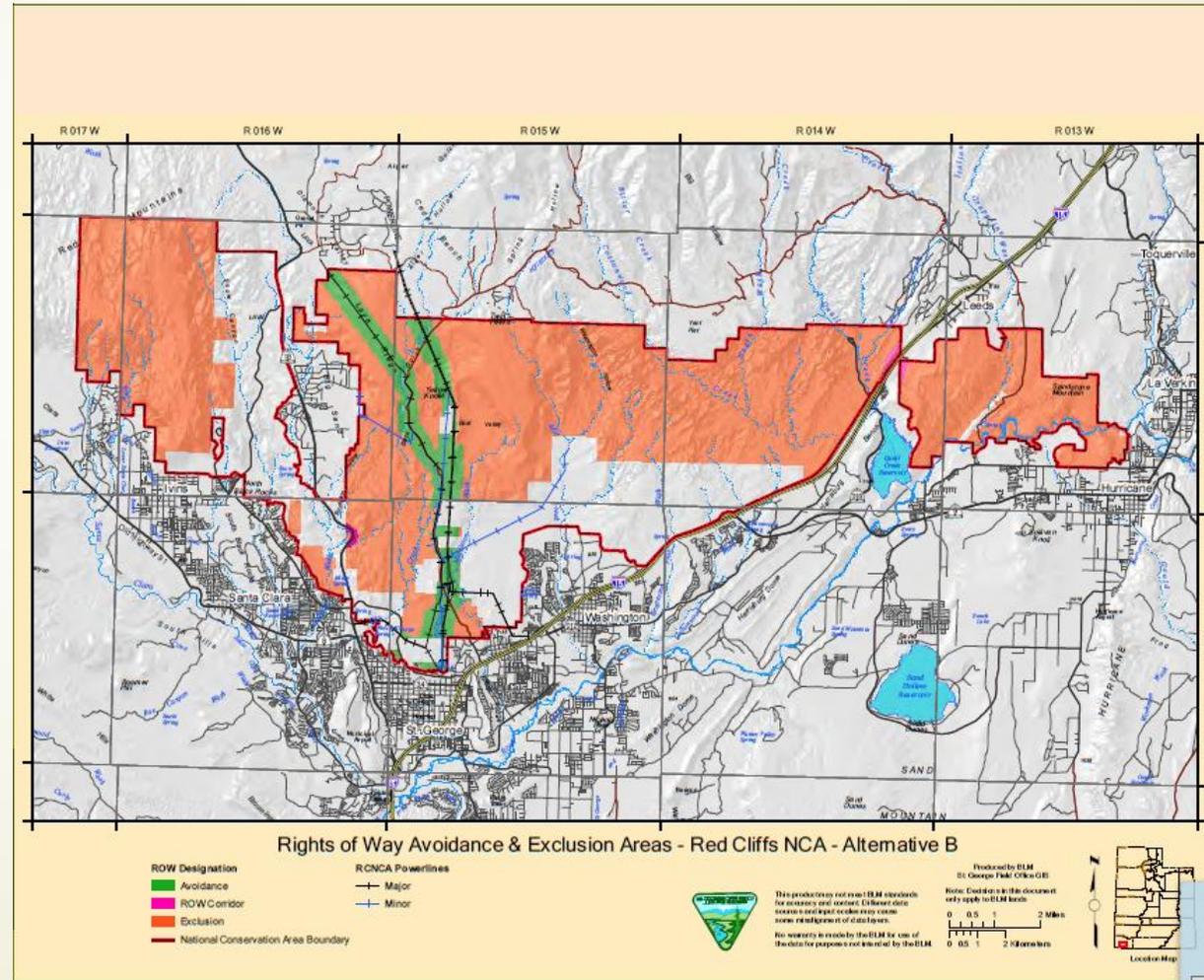


Northern Corridor

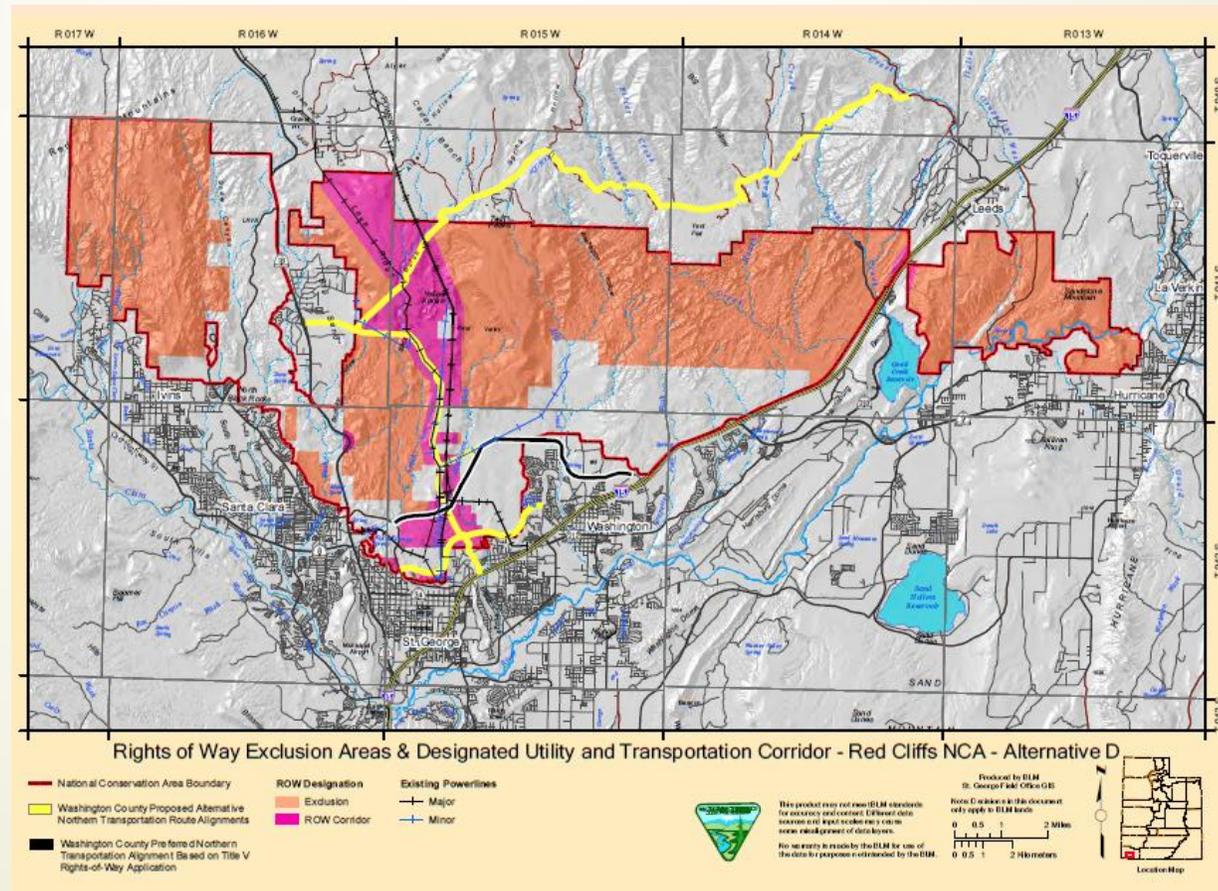
- OPLMA requires BLM to “identify 1 or more alternatives for a northern transportation route” “in developing the travel management plan.”
- In order for BLM to identify a route or routes in the travel management plan, the final RMP must contain a corridor designation that will allow one or more routes.



The BLM's Preferred Alternative Does Not Allow a Northern Corridor



Alternative D Exaggerates the Environmental Impact of a Northern Corridor by Analyzing the Proposed Routes Collectively rather than Individually



Northern Corridor Conclusion

- The final RMP needs to allow for the study and identification of a northern corridor in the travel management plan.



Overall Conclusion

- ▶ The BLM is working to address Washington County's concerns.
- ▶ The County is optimistic that the final RMP will:
 - ▶ Follow the intent of OPLMA, and
 - ▶ Acknowledge the ongoing cooperation between the BLM and Washington County (including the HCAC) in managing the Red Cliffs Desert Reserve and Red Cliffs NCA.

