

NWCOS Issues for CAMNet

On December 7, the NWCOS Planning Committee identified four issues that they would like CAMNet's adaptive management (AM) experts to look at and describe how AM could be written into the RMP and applied to these issues. The four issue areas to be explored by CAMNet are livestock grazing, energy development, travel management, and wilderness characteristics. Some individuals felt that having CAMNet address specific issues in the Little Snake Resource Area might be uncomfortable for NWCOS, so Jeremy has provided a hypothetical scenario for each issue. For each issue, Keystone has attempted to: 1) summarize the intersecting variables and interests, 2) clarify what Alternative C currently says on the issue, 3) describe how NWCOS members have responded to the language in Alternative C and what changes they have proposed, and 4) describe how others in NWCOS have responded to proposals for change. Keystone has also attempted to summarize NWCOS's more general discussions on adaptive management to capture the group's non-issue specific ideas on AM.

Please Note: This document is NOT intended to completely explain any sector's interests or comments on the issues being discussed. NOR does it address all the issues in the RMP for the Little Snake Resource Area. Although NWCOS has been asked to ensure that Keystone's summary is accurate, this document does NOT represent agreement by NWCOS on any issue. The goal of this document is to give CAMNet a brief summary of the issues and some grounding in NWCOS's experience.

Adaptive Management—Overarching Ideas and Concerns

1. A summary of the intersecting variables and interests.

Proponents of AM: County, Some Ranchers, Some OHV Enthusiasts

Moffat County and some members of the ranching community have expressed strong support for adaptive management. These folks would like to see AM be the first management tool that BLM turns to as they pursue management of all resources. Under this view, BLM would begin management actions by assessing the appropriateness of AM for the resource in question—where they deem it appropriate they would pursue and where they don't see it as appropriate they would pursue a more prescriptive approach. They feel AM can be used in any situation or BLM action, as long as monitoring is properly done.

Concerns about AM from Environmentalists

Environmentalists have expressed concerns about AM. They have asked how BLM will protect resources using AM, wondering whether it will be too late to protect a particular resource (sage grouse, game, water quality, etc.) once AM thresholds have been reached. Environmentalists have also stated that should lands be identified for protection of

wilderness characteristics, AM would not be an appropriate tool for managing uses such as energy development in these areas because they feel that any development would alter the wilderness characteristics to the degree they are no longer present in that area. Environmentalists have also asked how adaptive management addresses cumulative impacts to particular geographic area or the whole landscape. What protections exist if thresholds are met for a series of resources and there are bigger cumulative effects, and what protections exist if thresholds for several resources are almost (but not quite) met and no change in management is triggered but there is a negative cumulative impact?

Concerns about AM from Energy Developers

Energy developers have also expressed concerns about AM. They have asked what AM would mean for their leases—in particular, they wonder how the agency will allow flexibility on the ground without putting specific stipulations on their leases. They are concerned that some in NWCOS may be thinking that AM would mean that if a threshold for a particular resource is reached in an area where they are working, BLM would just add new stipulations to existing leases. Since leases are valid existing rights, energy companies do not believe that stipulations can be added to leases after they have been issued. If meeting AM thresholds means changing Conditions of Approval on Applications for Permit to Drill, this would change the rules in the middle of a company's work, which decreases their certainty and may decrease the value of the lease. Additionally, energy representatives are concerned that incorporating AM into the RMP would mean creating some sort of community panel that would assess monitoring results and determine if actions on the ground need to be changed. Companies are very concerned about the idea that how they exercise their rights and pursue development could be determined by anyone other than an individual company, the BLM, and other agencies such as the Colorado Division of Wildlife (DOW).

One Big Breakthrough on AM

NWCOS has had one major breakthrough regarding adaptive management. At the November 30 meeting, the group agreed that AM will not be used for land use allocation decisions. The RMP will determine what actions are allowable in which areas. AM should be used for implementation-level decisions, as BLM begins to allow and manage uses of the resources. This would mean that an area that has been designated as closed to oil and gas leasing at the land use allocation level would be off limits for energy-related AM at the implementation level.

Proponents of adaptive management and BLM **are looking for a way to establish a process within the RMP that would allow for the use of AM at the project level.**

They are looking for the exact language that would be needed in the RMP to achieve this goal. NWCOS and the Little Snake Field Office are well educated on the theory of AM and have heard quite enough about the general concept. What the BLM has been unable to do is find a way to integrate an AM strategy into the plan.

2. An overview of what Alternative C says on the issue.

BLM's working version of the draft RMP includes two appendices that address adaptive or flexible management: Appendix X and XX. Although BLM admits these do not

represent “true” or “pure” AM, they feel the appendices do provide some flexibility to users and the BLM. Appendix X offers procedures and criteria for granting exceptions, modifications, or waivers of stipulations on energy leases. The idea is that although a stipulation must be attached to a lease, it can be lifted later if that stipulation is deemed to be unnecessary after a look at the situation on the ground. BLM’s intent was to create a flexible strategy which allows the application of these stipulations on a case-by-case basis. The intent of Appendix XX is to tell BLM when to perform site-specific implementation planning to address an issue or concern. When specified criteria are met, site specific planning is triggered and changes in management can be made.

Throughout Alternative C, references are made to Appendix X (i.e., regarding ferruginous hawk, Alternative C states “Same as Alternative A. In addition, exceptions granted according to criteria established in Appendix X.”) The appendices are available on the NWCOS website, starting on page 145 of the draft alternative document (<http://nwcoss.org/Resources/BLM%20Documents/BLM%20Final%20Alternatives%209-30-05.pdf>).

3. What NWCOS dislikes about Alternative C and how they propose to improve it.

As discussed above, Moffat County and some in the ranching and OHV communities have been the most vocal about how Alternative C addresses adaptive management. Alternative C currently takes a prescriptive approach to management, while allowing for the possibility of exceptions, modifications, and waivers to protective stipulations through Appendix X. This sector would prefer to see adaptive management be the first tool that BLM considers applying, with prescriptions as the fallback approach.

4. How other NWCOS participants have responded to proposals for change to C

When the group representing the county and some in the ranching community gave its first presentation on their proposal to make AM the first tool that BLM considers, NWCOS members raised several concerns. These included:

- How do you set pro-active goals?
- How do you protect other sectors’ interests?
- How will BLM fund and staff monitoring?
- How can Booz Allen Hamilton (the RMP contractor) analyze the impacts of AM for the EIS?
- Where does the burden of proof on thresholds lie?

The county/ranching sector has begun answering these questions from their perspective. They suggest that BLM and users could work together to set proactive goals and find adaptive solutions to problems. Where adaptive solutions fail or are not appropriate, BLM would fall back to a more traditional prescriptive approach. They believe that the prescriptive fallback allows sufficient protection for other interests, that users could help pay for monitoring, and that users and BLM would share the burden of proof. Regarding the impact analysis, the group suggested that Booz Allen Hamilton should tie the analysis to the goals and objectives—analyzing both what happens if the goals and objectives are met and what happens if they aren’t.

Livestock Grazing

1. A summary of the intersecting variables and interests.

Hypothetical Scenario

During the renewal of a grazing permit and associated Environmental Assessment, BLM and the permittee want to implement a rotation system that they think will help the allotment get back into compliance with Standards for Rangeland Health. (Livestock management is governed by Standards and Guidelines for Rangeland Health).

NWCOS Concerns

NWCOS has not spent a lot of time discussing livestock grazing issues, largely because BLM has stated that the RMP revision will not make major concerns to current grazing management. BLM's Standards and Guidelines will continue to guide the agency's approach to this issue. However, several people in NWCOS have stated that they think livestock grazing is a great context in which to apply adaptive management.

CAMNET: Because livestock grazing is a less-contentious issue for NWCOS and so there are no proposals on the table for related changes to Alternative C, this may be an easy item to start with. For the above livestock scenario, please answer four questions:

1. How suitable is this scenario to using adaptive management? Why is the scenario particularly amiable to AM? Why is the scenario not a good fit for AM?
2. What are the challenges of using AM in this scenario?
3. What are the benefits of using AM in this scenario?
4. How would you write a decision in the RMP that would allow BLM to use AM for this implementation-level project? Please provide exact wording of the decision that would allow BLM to use AM at the project level.

Oil and Gas Development

1. A summary of the intersecting variables and interests.

Hypothetical Scenario

A gas company submits an Application for Permit to Drill (APD) a gas well in the Field Office, and the proposed well lies within big game winter range and is within a ¼ mile of a sage grouse lek. Presumably, BLM would process the APD with an associated Environmental Assessment, with the following stipulations attached to the lease:

1. Big game timing stipulation: Elk crucial winter habitat would be closed to surface disturbing activities from December 1 to April 30.
2. Greater Sage-Grouse No Surface Occupancy (NSO) within ¼ mile radius of a lek site. For the purpose of reducing potential impacts to greater sage-grouse lek integrity, NSO within ¼ mile radius of a lek site.

3. Greater Sage Grouse timing stipulation: Nesting habitat March 1- June 30. For the purpose of preventing disturbing up to 75% of nesting birds, from March 1- June 30, greater sage-grouse nesting and early brood-rearing habitat (as defined in Chapter 3) would be controlled surface use for oil and gas exploration and development and avoidance areas for other surface disturbing activities within a 4-mile radius of the perimeter of a lek. All surface disturbing activities would avoid only nesting and early brood-rearing habitat within the 4-mile radius of the lek during this time period.

Energy Developers' Concerns

Timing stipulations preclude drilling during much of the year and, consequently, lead to intensive drilling during October and November when there are fewer restrictions. Elk are over-abundant in the resource area, so limiting drilling to protect elk does not seem necessary. Reducing surface occupancy and disturbance around sage grouse leks across the board does not account for empty leks and forecloses an unnecessarily large area to activity because grouse don't occupy the entire 4-mile radius around the lek. Data on the grouse population in Moffat County indicate an increasing trend over the past 6 years. There are no published data that support increasing the radius to 4 miles from the current 2 miles.

Motorized Recreation Concerns

Members of the motorized recreation sector have also expressed concern about the 4-mile radius around lek sites. This sector believes that the radius could force seasonal closures of trails on very large areas of land, even if grouse are only located on a fraction of that area, although BLM staff have stated that grouse stipulations do not apply to OHV use. This sector shares the energy sector's concerns about the scientific basis for the 4-mile radius, and believes that proof of harm to grouse should be required before any roads and trails are closed to protect them.

Wildlife Advocate Concerns (including BLM Staff)

The existing 2-mile radius was based on data suggesting that this was all that was needed to protect 75% of nesting sage grouse. New data suggest that a 4-mile radius is needed to protect 75% of the population instead. The greater sage grouse has been proposed for listing on the endangered species list, and they are diminishing across the West. Data suggesting increasing populations since 1999 may just reflect the increasing effort that wildlife biologists have gone to in the past several years to find birds in the area. It is unclear what negative impact timing and surface use stipulations have on the energy industry.

2. An overview of what Alternative C says on the issue.

Alternative C currently states:

- For the purpose of reducing potential impacts to greater sage-grouse lek integrity, NSO within ¼ mile radius of a lek site. NSO area may be altered depending upon the active status of the lek or the geographical relationship of topographical barriers and vegetation screening to the lek site. In addition, exceptions granted according to criteria established in Appendix X.

- For the purpose of preventing disturbing up to 75% of nesting birds, from March 1- June 30, greater sagegrouse nesting and early broodrearing habitat (as defined in Chapter 3) would be controlled surface use for oil and gas exploration and development and avoidance areas for other surface disturbing activities within a 4-mile radius of the perimeter of a lek. All surface disturbing activities would avoid only nesting and early brood-rearing habitat within the 4-mile radius of the lek during this time period. Exceptions, modifications or waivers granted according to criteria established in Appendix X. The actual area to be avoided would be determined on a case-by-case basis dependent on applicable scientific research and site-specific analysis and other appropriate entities. The use of the following Best Management Practices (BMPs) will be encouraged for all surface disturbing activities. Use of these BMPs becomes even more important once disturbance reaches 10 percent of nesting habitat within 4 mile radius of an active lek. As new BMPs are developed, they may be added to the following list or replace some of the following BMPs. (Note to CAMNet: BLM cannot require use of BMPs. To require BMPs would mean turning them into a lease stipulation, which is not proposed in this RMP).
- Habitat Reclamation
 - Use early and effective reclamation techniques, including interim reclamation, to allow sage grouse habitat to be re-established as soon as possible. (may require multiple reclamation efforts)
 - Utilize reclamation seed mixes consisting of native bunchgrasses, forbs and subspecies of big sagebrush that are appropriate for the disturbed site and its potential.
 - Practice reclamation techniques that speed recovery of pre-existing vegetation.
 - Avoid aggressive, non-native grasses (e.g. intermediate wheatgrass, pubescent wheatgrass, crested wheatgrass, smooth brome, etc) in reclamation seed mixes.
 - Cooperate with county weed programs to control noxious weed infestations associated with oil and gas development disturbances.
- Footprint Reduction
 - Reduce long-term footprint of facilities to the smallest practical space.
 - Design and construct roads to minimize duplication.
 - Cluster development of roads, pipelines, electric lines and other facilities and use existing, combined corridors where possible.
 - Use directional drilling where biologically significant habitats are involved, to minimize impact to grouse habitat, if such techniques are technically feasible.
 - Minimize pad size and other facilities to the extent possible, consistent with safety. (Where directional drilling is utilized, larger pads are needed for multiple wells.)
 - Minimize width of field surface roads. Avoid engineered and graveled roads when possible to reduce the footprint.
- Reduce Disturbance to Birds

- Limit non surface disturbing activities during the breeding season (March 1 – May 1) near active sage grouse leks to portions of the day after 9:00 a.m. and before 4:00 p.m.
- Reduce noise impacts from compressor stations by locating stations and at least 2500 feet away from leks or by decibel reduction equipment.
- Field development plans will be required if exploration or wildcat wells indicate that substantial drilling may occur.
- Reduce daily visits to well pads and road travel to the extent possible in sage grouse habitat.
- Utilize remote telemetry to monitor wells when practical to reduce daily visits to wells.
- Gate field service roads or otherwise limit regular public access on field service roads (consistent with landowner wishes and direction for split estate wells or ROW access across private lands.)
- Crucial Winter Habitat: Same as Alternative A [which states that crucial winter habitat is closed December 16 to March 15. No exceptions.] In addition, exceptions would be granted according to criteria established in Appendix X.

3. What NWCOS dislikes about Alternative C and how they propose to improve it.

The energy sector has expressed the most concerns about the current language in Alternative C for sage grouse. As explained above, this sector believes that current timing and surface use restrictions to protect grouse are excessive and unwarranted. The primary proposal for change has been to remove the increase from a 2-mile to a 4-mile radius around leks and to limit timing restrictions to what is needed to protect severe winter habitat for grouse.

4. How other NWCOS participants have responded to proposals for change to C.

Individuals and sectors who have generally been supportive of adaptive management believe it could be great tool for addressing grouse management. Environmentalists and wildlife advocates believe that the increase to the 4-mile and the existing timing stipulations are justified and necessary. They are concerned that adaptive management may not make irretrievable damage to grouse evident in time to take corrective measures.

CAMNET: Now that you have the background on this discussion, please review the hypothetical scenario for oil and gas that is outlined above and answer four questions:

1. How suitable is this scenario to using adaptive management? Why is the scenario particularly amiable to AM? Why is the scenario not a good fit for AM?
2. What are the challenges of using AM in this scenario?
3. What are the benefits of using AM in this scenario?
4. How would you write a decision in the RMP that would allow BLM to use AM for this implementation-level project? Please provide exact wording of the decision that would allow BLM to use AM at the project level.

1. A summary of the intersecting variables and interests.

Hypothetical Scenario

BLM is undertaking a Travel Management Plan and associated Environmental Assessment for an area with lots of off-highway vehicle (OHV) use. The area is also a Herd Management Area (HMA) for wild horses, and habitat for big game, sage grouse, and other wildlife species. In addition, the area is leased for oil and gas and is currently being developed. BLM wants to manage OHV use to reduce conflicts and prevent resource damage. OHV users do not want BLM to close a route unless OHV use is shown to actually impact a resource.

OHV Enthusiasts Support AM for Travel Management

Much of the Resource Area is currently open to OHV use. The motorized recreation sector would like to see BLM leave all existing roads and trails open, unless adaptive management mechanisms indicate that there is a degradation of resources. If and when such degradation is indicated, BLM could then close the trails that are impacting the resource.

Other Sectors Have Concerns about Negative Impacts of OHVs

The wild horse sector has concerns about the negative impacts of OHV use on wild horses. In particular, there is concern about reports of OHVs “buzzing” wild horses and scaring them. The wildlife sector has concerns about the impacts of OHV use on plants and animals, through soil compaction, erosion, and noise. The non-motorized recreation enthusiasts would like BLM to control for noise pollution from OHVs that may carry over into areas designated for quiet, backcountry recreation. The wilderness sector would like to see some areas closed to motorized use in order to protect their potential for wilderness designation in the future.

2. An overview of what Alternative C says on the issue.

In Alternative C, BLM states that it will develop a transportation management plan, although that plan has not yet been started and will not be part of this RMP. However, through the land use allocation process, BLM has identified a few areas that will be closed to OHVs (some existing Wilderness Study Areas, critical wild horse water sources, and water impoundment areas). Two areas are open to OHVs, allowing OHV access anywhere, including off-trail. In several other areas, OHV use will be limited to designated routes “determined through adaptive management and travel management planning.”

Appendix XX states the following on the adaptive approach to travel management:

- Process

This process is designed to identify priority areas for detailed travel management planning. Areas designated in the RMP as “limited” will be managed as “limited to existing roads and trails” until the need to conduct

travel management planning arises. Policy states that restrictions in “limited” categories can include: number of vehicles, types of vehicles, time or season of vehicle use, permitted or licensed use only, use on existing roads and trails, use on designated roads and trails, etc. The indicators listed below are examples of the representative types of information that will be used to determine when/where site-specific travel management planning will be initiated. Site-specific travel management planning will be a collaborative process that will include Counties, permittees, stakeholders, agencies, and the general public. Route inventories would be conducted only to the extent necessary to solve identified travel management issues.

- **Indicators**

The following indicators are a starting point and may change depending on new information.

- Wildlife/wild horse population trends
- Evidence of trail/road proliferation
- Areas with high road/trail densities
- Impacts to cultural resources
- Unacceptable erosion
- Degradation of water quality
- Impacts to visual resources
- Loss of trail integrity
- Habitat fragmentation and damage
- Impacts to sensitive plants
- Need to provide for a variety of user experiences
- Presence of Special Management Areas
- Areas identified in the RMP as Limited to Designated Roads and Trails
- Areas that meet fragile soil criteria
- User and resource conflicts
- Increasing or changing recreation demand
- A pattern of user complaints

3. What NWCOS dislikes about Alternative C and how they propose to improve it.

The OHV sector does not want to see areas closed to OHVs or areas designated as limited to designated trails. Their proposal is that OHVs be limited to existing roads and trails and have BLM use AM to close trails that demonstrate damage.

4. How other NWCOS participants have responded to proposals for change to C

BLM staff and some environmentalists have stated that there is a “national trend” toward limiting OHVs to designated trails. Environmentalists have also responded that there needs to be a way to address potential conflicts between motorized and quiet recreationists before these conflicts arise.

CAMNET: Now that you have the background on this discussion, please review the hypothetical scenario for travel management that is outlined above and answer four questions:

1. How suitable is this scenario to using adaptive management? Why is the scenario particularly amiable to AM? Why is the scenario not a good fit for AM?
2. What are the challenges of using AM in this scenario?
3. What are the benefits of using AM in this scenario?
4. How would you write a decision in the RMP that would allow BLM to use AM for this implementation-level project? Please provide exact wording of the decision that would allow BLM to use AM at the project level.

Wilderness Characteristics

1. A summary of the intersecting variables and interests.

Hypothetical Scenario

A gas company submits an Application for Permit to Drill (APD) a gas well in the Field Office. BLM will process the APD with an associated Environmental Assessment. The proposed well would lie within an area that BLM has determined to contain wilderness characteristics (roadlessness, naturalness, opportunities for solitude and primitive, unconfined recreation). There are concerns that development of any type would degrade the wilderness characteristics to the degree the value would no longer be present within the area.

Wilderness Sector Views on Wilderness Characteristics

The wilderness sector would like to see BLM designate wilderness in the Little Snake Resource Area, and is frustrated that the Utah Wilderness Settlement currently prohibits designation of further Wilderness Study Areas on BLM lands. This sector has a Citizens' Wilderness Proposal (CWP) for the Little Snake that includes seven areas, and they are interested in seeing the potential of these lands for possible future wilderness designation maintained. The Little Snake staff have stated that while they cannot create new Wilderness Study Areas, they can manage certain areas to maintain the wilderness characteristics that the agency has determined are present in that area. This sector has stated that in order to protect an area's wilderness characteristics, BLM would need to close it to OHVs and energy development.

Other Sectors' Views on Wilderness Characteristics

All the other sectors have stated at one time or another that they would like the RMP to protect open space. "Open space" is often used interchangeably with "wilderness" by people outside the wilderness sector. Some have stated that the open character of the land could be maintained without closing certain areas to energy development, because there are ways to develop energy resources to minimize visual impacts (painting or otherwise camouflaging drill rigs, for example), to minimize biological impacts, and to allow for maximum reclamation of the land when wells are retired. The wilderness sector does not accept this approach because even the best energy development will degrade the wilderness experience in the short term and leave traces of human presence that will preclude wilderness designation in the long term.

Vermillion Basin

Vermillion Basin is one area that is included in the Citizens' Wilderness Proposal. Much of Vermillion has also been found by BLM to have medium or high potential for natural gas. BLM has inventoried Vermillion for wilderness characteristics and found them to be present in 77,067 out of 81,028 total acres. This determination is disputed by Moffat County.

Although a small amount of Vermillion is currently leased, the area was administratively withdrawn from leasing in 1997 and has therefore been managed under a de facto closure to energy development since that time.

Vermillion Basin is open to grazing and there are active allotments in the area. Ranchers who graze their livestock in this area would like to be able to do the necessary upgrades to the land to provide for their livestock needs (upgrades often include stocking water, building fences, etc.). An area managed for wilderness characteristics could preclude some kinds of this activity unless it was expressly stated otherwise.

There was briefly a NWCOS working group on Vermillion that tried to find creative ways to meet different sectors' needs. Some of the ideas the working group generated are contained in Alternative C. These ideas do not have support from all sectors.

2. An overview of what Alternative C says on the issue.

Alternative C currently addresses three areas with wilderness characteristics that are outside of existing Wilderness Study Areas. Two of these areas are closed to energy development and OHVs are limited to designated trails. The third area, Vermillion Basin, has been divided into two zones according to their respective potentials for natural gas. The exact language from Alternative C for Vermillion is:

Zone 1 (Northern Zone of High and Medium potential):

- Objectives:
 - Allow for oil and gas leasing, exploration, and development by utilizing state of the art technology, while protecting natural values.
 - Manage for minimal surface disturbance by focusing development near existing trails, ROWs, canyons and washes and clustering wells where feasible.
 - Manage to minimize visual intrusions, Lookout Mountain as observation point Control infrastructure by requiring pre-planning, including transportation planning.
 - Lease in larger leases (4 section blocks) in order to facilitate seismic exploration and allow operators to drill fewer wells
 - Long term goal for Vermillion Basin is to manage the area so that any disturbance caused by permitted actions will eventually be returned to state prior to development.
- Minerals and Energy: Open to new oil and gas leasing with a Controlled Surface Use stipulation. Stipulation language would reference. Objectives above.

- Locatable – Closed
- Other Minerals - Closed
- Coal – Closed
- OHV: Limited to Designated Routes
- VRM: Class III, Class II for Vermillion Bluffs area
- Lands and Realty: Case-by-case basis, avoidance for Vermillion Bluffs and fragile soil areas

Zone 2: (Southwest area of Low and No Known potential)

- Objectives: Manage to protect naturalness, opportunities for semi-primitive recreation, and solitude.
- Minerals and Energy: Closed to new oil and gas leasing
- Locatable – Closed
- Other Minerals - Closed
- Coal – Closed
- OHV: The portion of Vermillion Basin south and east of Ted’s Draw will be Limited to Designated Routes. The remaining portion of Zone 2 will be Closed to OHVs.
- VRM: II
- Lands and Realty: Exclusion/avoidance area

3. What NWCOS dislikes about Alternative C and how they propose to improve it.

NWCOS regularly refers to this idea for Vermillion as the “split the baby” approach, and it is not particularly popular. The wilderness sector, in particular, would like to see all of Vermillion managed as one unit to protect its wilderness characteristics. Other sectors do not see the need to close part of Vermillion to energy development or motorized vehicles (including OHVs) because these uses can be managed to minimize impact. NWCOS has not spent much time discussing Alternative C’s treatment of the other areas with wilderness characteristics that are outside existing Wilderness Study Areas.

4. How other NWCOS participants have responded to proposals for change to C

Responses to proposals along the lines described above have been received with each sector reiterating its position on what BLM should do with Vermillion. NWCOS has struggled with ways that everyone’s interests can be addressed.

CAMNET: Now that you have the background on this discussion, please review the hypothetical scenario for protecting wilderness characteristics that is outlined above. Please note that some in NWCOS feel it is important that you address this issue in the **abstract** (without referring to any particular geographic area). Please answer four questions on this issue:

5. How suitable is this scenario to using adaptive management? Why is the scenario particularly amiable to AM? Why is the scenario not a good fit for AM?
6. What are the challenges of using AM in this scenario?
7. What are the benefits of using AM in this scenario?

8. How would you write a decision in the RMP that would allow BLM to use AM for this implementation-level project? Please provide exact wording of the decision that would allow BLM to use at the project level.