

Addresses Concerns Raised By Which Sector: Oil and Gas, Moffat County

Concern Addressed: Need for RMP to accommodate adaptive concerns.

Our Proposal Outlines Needs For Exchange

Modification or Exchange Criteria:

We propose that the RMP protect the seven Citizen-Proposed Wilderness lands in the context of a larger landscape vision for the entire resource area that balances and accommodates the full range of public values and uses in a way that is sustainable. The plan should acknowledge and allow for a spectrum of multiple uses and values—from wilderness to working landscapes to more intensive use areas—with integrated adaptive management principles where appropriate. In order for us to address the adaptive concerns other sectors have raised, *we need to understand that folks in NWCOS are willing to agree that one element of our collective community vision will be to protect the wilderness character of a portion of the LSRA (outside but including the existing WSAs) by placing these areas off limits to surface disturbing activities (oil and gas development) and off limits to other uses which degrade opportunities for solitude and primitive and unconfined recreation (motorized/mechanized travel).*

This Solution Meets the Needs of The Sector That Raised the Concern By:

We are willing to explore the specific details of some of the adaptive concerns raised by other sectors—something that NWCOS has yet to get into. In exploring these issues (looking at some maps again), we would like to understand specific places, resources, or uses where these proposals would be applied.

This Solution Meets the Needs of Our Sector By:

Providing protection for wilderness character within the proposed wilderness areas (seven areas totaling ~270,000 acres) in the Little Snake Resource. This would involve withdrawing the areas from surface disturbing mining activities and motorized/mechanized travel.

This Solution Also Meets The Needs of Other Sectors By:

Habitat Sector (maybe): The oil and gas sector and Moffat County acknowledging protecting lands as part of the spectrum of multiple and values within the resource area in the context of exploring and considering how to accommodate their adaptive concerns (e.g. timing limitations) in some areas.

Addresses Concerns Raised By Which Sector: Oil and Gas

Concern Addressed: Definition of what lands are available for leasing: appreciating that there are stipulations (e.g. timing limitations) in place on lands deemed “open” or “available” for oil and gas development.

Our Proposal Outlines Needs For Exchange:**Modification or Exchange Criteria:**

Stipulations should be clearly defined as to their requirement, locations, applications, as well as likelihood of BLM granting waivers, exceptions, or modifications. We are also concerned ourselves with listing ALL the stipulations in such a way to suggest that they ALL apply to every acre (when’s the last time the mountain sheep stip was applied?). Even if drilling is precluded for a portion of a given year due to timing limitations, the minerals are still available and can be produced. We believe that drilling can proceed in manner that is both economical and environmentally sound, and it is our obligation as NWCOS to ensure this takes place. While better acknowledging the lands open for development come with varying levels of constraints, there also needs to be agreement that the minerals are still available for production, and that that 95% of the technically available oil and gas within the resource area falls outside the citizen-proposed wilderness areas. Also, there needs to be acknowledgement that timing limitations do not preclude the development or surface disturbance of full field development.

This Solution Meets the Needs of The Sector That Raised the Concern By:

Providing clarity on what is meant by areas “open” to development is available under varying degrees of constraints/stipulations.

This Solution Meets the Needs of Our Sector By:

Providing clarity on how little, in terms of the total resource within the LSRA, would be unavailable if the lands within the citizen-proposed areas were left undeveloped. This also acknowledges that many of the timing limitations do not direct the size of the development footprint.

This Solution Also Meets The Need of Other Sectors By:

Providing clarity on these issues will help the public, BLM, and NWCOS better understand the issues we are collaborating on.

Addresses Concerns Raised By Which Sector: Oil and Gas

Concern Addressed: Timing limitations are too inflexible, onerous

Our Proposal Outlines Needs For Exchange:**Modification or Exchange Criteria:**

In considering how development can occur differently in some areas where some level of oil and gas development is deemed appropriate, we should also acknowledge that *there are places where drilling is not appropriate* (such as citizen-proposed wilderness and other sensitive places—see our first exchange criteria). In places where oil and gas development is more appropriate, extraction of resources in an environmentally sound manner is still a priority. Therefore, there must be agreement that acceptance that any “flexibility” for certain timing limitations/locations, *there must also be NWCOS agreement that where does occur, it occurs with a lesser degree of surface disturbance or fragmentation to the landscape—the development must proceed with a reduced footprint*. On existing leases, this would mean accepting conditions and mitigation measures reducing footprint. On future leases, this would mean stipulations relating to surface occupancy and surface use.

This Solution Meets the Needs of The Sector That Raised the Concern By:

Working through the details of this proposal could allow for some of the types of development the oil and gas sector is seeking.

This Solution Meets the Needs of Our Sector By:

Acknowledgment that commitments to reduce the footprint on existing lease are not only voluntary, industry is committed to accepting and implementing these measures within the RMP.

This Solution Also Meets The Need of Other Sectors By:

Habitat Sector (maybe): one of the habitat sector priorities is that current timing limitations do not provide long-term habitat protection. This solution would be to work towards implementing such long-term protections through reduced surface disturbance.

Addresses Concerns Raised By Which Sector: OHV, Moffat County

Concern Addressed: areas to be “closed” to OHV/motorized

Our Proposal Outlines Needs For Exchange:

Modification or Exchange Criteria:

The coalition of groups participating in NWCOS (Colorado Wilderness Network and others) is opposed to policies and management that allows cross-country travel of OHVs on public lands. “Stay The Trail,” the current responsible use policy of state and national motorized user groups, also conflicts with the notion of cross-country travel. We feel strongly that, across the resource area, the spectrum of recreational values and uses should include wilderness and backcountry quiet recreation, motorized recreation, and areas of mixed use that provide a variety of experiences. We also recognize that Sandwash Basin, in particular, will remain open to most of the existing routes and access in the plan. However, in order for us to consider even a small, clearly delineated “open” area in Sandwash Basin, other sectors must be willing to agree that there are additional places that should be managed for quiet recreation experiences, closed to motorized recreation and travel, including the proposed-wilderness lands and other opportunities quiet or backcountry recreation.

This Solution Meets the Needs of The Sector That Raised the Concern By:

Working through the details of this solution could allow for some of the motorized experiences being sought within the LSRA including Sandwash.

This Solution Meets the Needs of Our Sector By:

Areas closed to motorized, including the proposed wilderness areas and other areas identified for quiet backcountry recreation.

This Solution Also Meets The Need of Other Sectors By:

Moffat County (maybe): there would be a collaborative agreement on what routes are necessary to leave open to motorized to maintain a balance of recreational uses across the resource area.

Addresses Concerns Raised By Which Sector: Oil and Gas(?), Moffat County

Concern Addressed: rare and sensitive resources should be protected(?) but ACECs not designated; impacts to oil and gas from management/designation of ACECs.

Our Proposal Outlines Needs For Exchange:

Modification or Exchange Criteria:

The rare and sensitive resources need to be described and protected in the resource management plan. So far, NWCOS has been in disagreement as to how. Our feelings are that designation of ACECs with site-specific management plans is the best way to accomplish this. In taking a landscape level view of the resource areas some site-specific resources—such as rare and sensitive plant populations—should be protected. We feel that *all the nominated ACECs warrant designation and protection as ACECs in the preferred alternative, and FLMPA requires as much. For some of the Natural Systems ACECs in Alternative D (right now we are considering five), we would be willing to consider forgoing pushing for the ACEC designation so long as proper management prescriptions are in place (such as NSO stipulations). The four existing ACECs, the WTPD ACEC and at least four of the Natural Systems ACECs must be designated and receive site-specific management plans in the RMP.* (see below) NSO stipulations for these areas.

This Solution Meets the Needs of The Sector That Raised the Concern By:

This proposal would allow for proper management, without designation of ACECs, for some of the ACECs in Alternative D.

This Solution Meets the Needs of Our Sector By:

The current Alternative C provides no special management or protections of the Natural Systems meeting relevance and importance criteria. This proposal would provide a mixture of designated ACECs and other areas not designated as ACECs that receive protective management.

Natural Systems ACECs

Gibbons Beardtongue	Gibbons beardtongue (BLM S)
Bull Canyon	rare plant communities, BLM Sensitive plant species (Duchesne milkvetch)
G Gap	rare plant communities, BLM Sensitive plant species
Cold Desert Shrublands	rare plant communities, BLM Sensitive plant species

Exiting ACECs

Limestone Ridge	remnant plant communities, BLM Sensitive plant species, Scenic qualities
Lookout Mountain	BLM Sensitive plant species, Scenic qualities
Cross Mountain	Threatened & Endangered Species, BLM Sensitive plant species, Scenic qualities

WTPD ACEC

White-tailed Prairie Dog white-tailed prairie dog, black-footed ferret habitat