

1 Scoping Comments Submitted by

2
3 **Northwest Colorado Stewardship (NWCOS)**

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5 **OVERARCHING QUESTIONS**

6 **Overall Ecosystem Health:** What is the current condition of overall ecosystem health in the
7 Little Snake Resource Area (LSRA)? Given the BLM's multiple-use objectives and outcomes,
8 what is the desired future condition of overall ecosystem health in the LSRA and what will it
9 take to get there? What indicators should be monitored using best available science to determine
10 if desired future conditions are being met while minimizing any negative impacts to the social
11 and economic health of the community? How can BLM implement multiple-use in a way that
12 best serves our communities and society?

13 **Socioeconomic Conditions:** What is the current contribution of the LSRA lands to local, state,
14 and national socioeconomic conditions (including both quantitative and qualitative values)?
15 How will management decisions in the RMP positively and negatively affect these
16 socioeconomic values at the local, state, and national level? How can the custom and culture of
17 the local community be enhanced while achieving the RMP goals?

18 **Vegetation Management:** What is the current condition of vegetation for key ecosystem types
19 (e.g., grasslands, sagebrush steppe, Douglas-fir forests, etc.) in the area? Given BLM's multiple-
20 use objectives and outcomes, what is the desired future condition of vegetation for key
21 ecosystem types and what will it take to get there? What indicators should be monitored using
22 best available science to determine if desired future conditions are being met?

23 **Wildlife, Fish, and Special Status Species:** What is the current status of special status animal
24 and plant species and key game species? Which strategies (taking into account current efforts
25 and plans, including using hunting and habitat management as key tools) will be developed to
26 recover special status species and to manage game species in accordance with Colorado Division
27 of Wildlife Data Analysis Unit (DAU) plans and local management plans? What actions will be
28 identified to achieve desired future population and habitat conditions? What indicators should be
29 monitored using best available science to determine if desired future conditions are met?

30 **Archaeological, Paleontological, and Historical Resources:** What archaeological,
31 paleontological, and historical resources should be protected in the Little Snake Area? How
32 could these resources best be protected? What indicators should be monitored using best
33 available science to determine if desired future conditions are met?

34 **USES AND ISSUES OF SPECIAL CONCERN**

35 **Grazing:** What is the current landscape condition of livestock grazing allotments? What is the
36 desired future condition to sustain and enhance livestock grazing allotments? Which areas are
37 appropriate for livestock grazing and under what conditions? What indicators should be
38 monitored using best available science to determine if desired future conditions are being met?

39 **Energy and Minerals:** Where are energy and mineral resources located? Which areas are
40 appropriate for energy and mineral leasing and development and under what conditions? What
41 indicators should be monitored using best available science to determine if desired future
42 conditions are being met? What special management considerations, if any, should be made for

43 split-estate lands? How will management of surface resources affect availability of lands for
44 energy and mineral development? How can impacts of energy and mineral development on
45 other key resources be minimized?

46 **Recreation:** What recreation opportunities (including motorized, mechanized, and primitive
47 recreation) do we want to maintain in which areas (including, but not limited to hunting, fishing,
48 riverine recreation, OHV riding, and all other recreation types)? How best to balance increasing
49 recreation uses of various types with maintaining a quality recreation experience, minimizing
50 conflicts with other uses and recreational users, and minimizing environmental impacts? What
51 indicators using best available science should be monitored to determine if desired future
52 conditions are being met?

53 **Special Designations:** Which areas are appropriate for special designations and what definitions
54 will be used to determine the qualifications for special designations? What are the desired future
55 outcomes of these designations? What uses are allowed in special designation areas? What
56 indicators should be monitored to determine if desired future conditions are met? How will these
57 designations interact with state and private in-holdings?

58 **Travel and Off-Road Vehicle Management:** Where will travel and off-road vehicle use be
59 directed/allowed and at what levels? Which areas will be open, closed, or limited for certain
60 types of travel and how will routes be identified and designated? How will this use best be
61 managed? What indicators should be monitored to determine if desired future conditions are
62 being met?

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64 **Protection of Lands with Wilderness Character:** Which areas are appropriate to protect for
65 their wilderness character? How can this protection best be accomplished? What indicators
66 should be monitored to determine if desired future conditions are being met? What will be the
67 positive and negative impact of protecting these wilderness characteristics on other key
68 resources?

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70 **Valid Existing Rights:** What valid existing rights are present within the LSRA? How, if at all,
71 will the RMP affect and be affected by these valid existing rights?

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74 **What is NWCOS?**

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76 The Northwest Colorado Stewardship (NWCOS) is a collection of highly diverse individuals and
77 organizations committed to improving public lands decision-making by promoting commonly
78 held values and principles. The Department of Interior recognizes NWCOS as a pilot project
79 aimed at demonstrating Secretary Norton's 4C's-conservation through communication,
80 consultation, and cooperation.

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82 NWCOS meets on a regular basis in Craig, Colorado and as there is no formal membership, all
83 individuals interested in public lands decision-making are invited to attend and participate in
84 meetings. Additional information regarding NWCOS can be found at www.nwcoss.org or by
85 calling Kristi Parker Celico at 800-842-7485, ext. 5848.

86 **Why is NWCOS Submitting RMP Consensus Scoping Comments?**
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88 NWCOS is very interested in the RMP process and appreciates that BLM is willing to actively
89 participate in its meetings. In recent months, NWCOS has spent a great deal of time learning
90 about the BLM RMP process and its strengths and weaknesses. As part of this learning, we have
91 identified two related challenges that are common to the BLM RMP scoping process.
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- 93 **1. Individual Public Comments not Seen in Final Scoping Report.** Members of the
94 public submit public scoping comments and BLM records all of these comments.
95 Typically then, BLM or its contractor summarize these comments by category and issue
96 in the main text of the scoping report. Often, individual comments are included in an
97 appendix. This re-framing of the issues in the main text often reduces 100’s of pages of
98 sometimes repetitive ideas into a ten-page summary. It also allows BLM to frame the
99 issues at the appropriate level for RMP decision-making and using the language required
100 by laws governing BLM planning processes. For example, a member of the public might
101 comment about their concern regarding access to a particular piece of public property.
102 Since the RMP does not typically address specific pieces of property, this comment will
103 be incorporated, but in the category regarding access to public lands.
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105 Although the individual submitting public comments and BLM synthesizing the
106 comments makes sense in the abstract, it often leads to great public frustration. The
107 public cannot see how their individual comments were incorporated and often feels that
108 BLM did not hear them at step one in the RMP process. Often representatives of the
109 public wonder why they took the time to participate since the bureaucracy ignored them
110 anyway and then simply opt out of participating until the final RMP comes out, at which
111 point they might pursue legal recourse regarding their interests. BLM ends up equally
112 frustrated as to why community members that care deeply about land issues don’t
113 participate in the public process along the way, but instead chose to “hide in the weeds”
114 until a final document is produced.
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- 116 **2. BLM and Community Do Not Reach Agreement on Key RMP Issues.** A second
117 concern noted by NWCOS is that BLM’s summary of key issues in the scoping report
118 often ends up looking like a laundry list. There is typically no real prioritization of key
119 issues or attempt to seek buy-in from the public on key issues the RMP must address.
120 Without this initial agreement on what the issues are, BLM and the community are often
121 trying to solve different problems in the same document and thus begin with failure in
122 mind.
123

124 Given these two common challenges with BLM’s scoping process, NWCOS decided to draft up
125 a short list of key questions that they thought the RMP process must address. They framed all of
126 their issues in the form of questions to acknowledge that they didn’t yet have agreement on how
127 to proceed—but they did have agreement that these are the key questions that must be addressed
128 in the RMP.

129 **How Was This Consensus Achieved?**

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131 NWCOS invited all of its 100+ members to complete a survey identifying their key issues and
132 concerns they would like addressed in the RMP. From this survey, NWCOS participants met in
133 small groups to list the issues they would like addressed in the RMP. At this point, BLM
134 provided a tutorial for NWCOS on the level of questions that RMPs typically address and helped
135 the group focus their issues at this appropriate level. NWCOS was able to simplify this list to
136 approximately one page of key questions they hope the RMP addresses. With the one-page
137 document in hand, all NWCOS members were encouraged to attend the public scoping meetings
138 and to see if NWCOS had missed key issues that are of importance to the greater community.
139 With this additional input, NWCOS finalized its scoping comments.

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141 **Does NWCOS Speak for the Community?**

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143 Although NWCOS is made up of a wide variety of the community that work, live, and/or play in
144 the Little Snake Resource Area, NWCOS does not formally represent the community and BLM
145 will incorporate NWCOS scoping comments into their scoping summary in the same way that
146 they include comments from all members of the public. NWCOS has no special status.
147 However, in pursuing this task, we hope that we have clarified to the best of our ability what we
148 think are the key issues that NWCOS hopes to address in the RMP process. In other words, that
149 it will help focus our work. And to the extent that it is useful, we hope that members of the
150 public that are not involved in the NWCOS process read this summary and are encouraged to
151 come participate in our endeavor to improve public decision-making on public lands.