

Chapter 6

Consultation and Coordination



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Changes to Chapter 6 between Draft LUPA/EIS and Proposed LUPA/Final EIS

- Chapter 5 in the DEIS was renumbered to become Chapter 6 in the Proposed LUPA/FEIS.
- General corrections (e.g., typographical errors) and clarifications were included.
- A summary of the public comment period and public comments on the Draft LUPA/EIS was added in **Section 6.2.5**, Public Comment on the Draft LUPA/EIS.
- Future opportunity for public involvement was added in **Section 6.2.6**, Future Public Involvement.

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Chapter 6. Consultation and Coordination

6.1 Introduction

This chapter describes the efforts undertaken by the BLM and Forest Service throughout the process of developing the LUPA/EIS to ensure the process remained open and inclusive to the extent possible. This chapter also describes efforts taken to comply with legal requirements to consult and coordinate with various government agencies. These efforts include public scoping; identifying and designating cooperating agencies; consulting with state, local, and tribal governments; and determining whether the LUPA/EIS is consistent with tribal, state, local, and county plans.

The BLM and Forest Service land use planning activities are conducted in accordance with NEPA requirements, CEQ regulations, and US Departments of the Interior and Agriculture policies and procedures implementing NEPA, as well as specific BLM and Forest Service planning and NEPA policies. The NEPA and associated laws, regulations, and policies require the BLM and Forest Service to seek public involvement early in and throughout the planning process to develop a range of reasonable alternatives to proposed actions and to prepare environmental documents that disclose the potential impacts of proposed alternatives.

Public involvement and agency consultation and coordination have been at the heart of the planning process leading to this LUPA/EIS. These efforts were achieved through Federal Register notices, public and informal meetings, individual contacts, media releases, planning bulletins, and a series of GRSG planning-related Web sites. This chapter documents the outreach efforts that have occurred to date.

6.2 Public Involvement

In accordance with CEQ scoping guidance, the BLM and Forest Service provided opportunities for public involvement as an integral part of amending the LUPs and preparing the EIS. CEQ scoping guidance (1981) defines scoping as the process by which lead agencies solicit input from the public and interested agencies on the nature and extent of issues and impacts to be addressed and the methods by which they will be evaluated. The scoping comment summary report, which summarizes comments received during the scoping process, is available on the BLM's National GRSG Web site at http://www.blm.gov/wo/st/en/prog/more/sagegrouse/documents_and_resources.html.

The intent of the scoping process is to provide an opportunity for the public, tribes, other government agencies, and interest groups to learn about the project and provide input on the planning issues, impacts, and potential alternatives that will be addressed in the EIS, and the extent to which those issues will be analyzed. In general, public involvement during scoping assists the agency through the following:

- Broadening the information base for decision-making
- Informing the public about the EIS and proposed LUPAs and the potential impacts associated with various management decisions

- Ensuring public needs and viewpoints are brought to the attention of the agency
- Determining the scope and the significant issues to be analyzed in depth in the EIS

6.2.1 Scoping Period

The scoping period for the Idaho and Southwestern Montana Sub-region LUPA/EIS began with the publication of the NOI in the Federal Register on December 9, 2011, and ended on March 23, 2012. The scoping period provides an opportunity for the public to identify potential planning issues and concerns associated with the LUP amendments and EIS. Information obtained by the BLM and Forest Service during scoping is combined with issues identified by the agencies to form the scope of the EIS.

6.2.2 Public Notification of Scoping

A press release was made available on the national, Great Basin Region, and Rocky Mountain Region Web sites on December 8, 2011, announcing the scoping period for the EIS process. A similar press release was also sent out from the BLM Idaho State Office on January 5, 2012. The press releases provided information on the scoping open houses being held (see *Public Scoping Open Houses* below) and described the various methods for submitting comments. A second press release was posted on the project Web sites on February 7, 2012, announcing the extension of the public scoping period to March 23, 2012. A newsletter was also sent out to the mailing list as described below (see Newsletter and Mailing List).

In addition to news releases and other notifications from the BLM and Forest Service regarding the scoping process, some members of the public received notification from other sources. Several articles were published in local newspapers, including in the Times New on January 28, 2012, and the Idaho Mountain Express on February 29, 2012.

The national GRSG conservation Web site (see Web site below) provides background information on the project, a description of the scoping process and meeting locations, instructions on how to submit comments, and copies of public information documents such as the NOI. The Web site is one of the methods used to communicate project news and updates to the public. The Web site is available on the Internet at <http://www.blm.gov/sagegrouse.html>.

6.2.3 Public Scoping Open Houses

The BLM and Forest Service hosted six open houses throughout the Idaho and Southwestern Montana Sub-region to provide the public with opportunities to become involved, learn about the project and the planning process, meet the planning team members, and offer comments. Where possible, representatives from the USFWS and state fish and game agencies also attended. The open houses were advertised via press releases, the project newsletter, and the project Web sites. The locations of the open houses are provided in **Table 6-1**, Idaho and Southwestern Montana Sub-region Scoping Open Houses.

Table 6-1
Idaho and Southwestern Montana Sub-region Scoping Open Houses

Location	Venue	Date	Number of Attendees
Idaho			
Boise	Red Lion Boise Hotel	January 9, 2012	110
Idaho Falls	Red Lion Hotel	January 10, 2012	63
Salmon	Salmon Valley Business & Innovation Center	January 11, 2012	63
Twin Falls	Canyon Springs Red Lion Inn	January 25, 2012	87
Pocatello	The Clarion	January 26, 2012	58
<i>Idaho Total</i>			<i>381</i>
Montana			
Dillon	National Guard Armory	January 12, 2012	47
<i>Montana Total</i>			<i>47</i>
Idaho and Southwestern Montana Sub-region Total			428

Scoping meetings were held in an open house format to encourage participants to discuss concerns and questions with the BLM and Forest Service and other agency staff representatives. Copies of scoping information, as well as blank scoping comment forms, were available at the sign-in station. Resource stations displayed maps to illustrate the planning area under consideration, GRSG habitat and bird densities, resource uses (e.g., rights-of-way, energy, livestock grazing, and recreation), and resource conditions (e.g., vegetation and wildland fire). At those stations, fact sheets for various topics (e.g., planning process, purpose and need, preliminary planning issues, preliminary planning criteria, GRSG conservation, biology and habitat, and threats to GRSG) provided an overview of current management practices and issues.

6.2.4 Other Public Involvement

Newsletter and Mailing List

In December 2011, the BLM and Forest Service mailed a newsletter announcing the start of the public scoping period for the Great Basin EISs, including the Idaho and Southwestern Montana Sub-region, to more than 14,000 individuals from the public, agencies, and organizations who had participated in past BLM and Forest Service activities and had been included on past BLM and Forest Service distribution lists. The newsletter provided background information and an overview of the National GRSG Planning Strategy, the dates and venues for the scoping open houses (see Public Scoping Open Houses above), and the various methods for submitting comments, including dedicated email and postal addresses. In December 2012, the BLM and Forest Service mailed a postcard providing a notification of updates to the national Web site.

The BLM and Forest Service will publish future newsletters at major project milestones and will mail them to individuals and organizations that have requested to remain on or be added to the project mailing list. All newsletters will be made available on the national or regional

project Web sites. Participants may request to receive newsletters and other project information through electronic or postal mail.

Web Site

The BLM launched a national GRSG conservation Web site as part of the agency's efforts to maintain and restore GRSG habitat on BLM-administered lands. The site is intended to make it easy to find out about how the BLM and Forest Service are working on maintaining and restoring GRSG habitat, and includes background information related to governmental and the BLM and Forest Service roles in GRSG conservation. The Web site is available on the Internet at <http://www.blm.gov/sagegrouse.html>.

The BLM has also launched a regional Web site for the Great Basin Region. This site is regularly updated to provide the public with the latest information about the EIS processes in the region. The regional Web site provides background information about the project, a public involvement timeline, maps of the planning areas, and copies of public information documents such as the newsletter and NOI. The site also provides a description of how to submit comments about the EIS process, including a link to the scoping comment email address. The dates and locations of scoping open houses were also announced on the regional Web site. The Great Basin Region Web site is available on the Internet at <http://www.blm.gov/wo/st/en/prog/more/sagegrouse/western.html>. A link to this Web site is also provided on the National Web site.

6.2.5 Public Comment on the Draft LUPA/EIS

Public Meetings

A notice of availability (NOA) for the Draft LUPA/EIS was published in the *Federal Register* on November 1, 2013. This initiated a 90-day public comment period, which ended on January 29, 2014. The BLM and Forest Service notified the public of open house meetings via the project website and a news release to various newspapers and radio and television stations.

The BLM and Forest Service held seven public comment open houses for the Draft LUPA/EIS from January 6 through January 15, 2014, as follows:

- Murphy, Idaho, on January 6, 2014
- Idaho Falls, Idaho, on January 7, 2014
- Salmon, Idaho, on January 8, 2014
- Dillon, Montana, on January 9, 2014
- Pocatello, Idaho, on January 13, 2014
- Twin Falls, Idaho, on January 14, 2014
- Boise, Idaho, on January 15, 2014

All meetings were from 5:30 to 7:30 p.m. The goal of the open houses was to inform the public about the Draft LUPA/EIS and to obtain further public input on the alternatives that were

developed and analyzed. In addition, the BLM and Forest Service sought comments on potential impacts from the six alternatives. At the open houses, displays introduced the various resource topics and presented the six alternatives for the resource topics. Other displays explained the NEPA process and the methods for submitting comments. A slide show looped throughout the open house describing the Idaho and Southwestern Montana Sub-region Greater Sage-Grouse Draft LUPA/EIS preparation process.

Public comments were solicited at the open houses, where comment sheets were provided.

Comment Analysis Methodology

After publishing the Draft LUPA/EIS, the BLM and Forest Service held a 90-day public comment period to receive comments on the Draft LUPA/EIS. The BLM and Forest Service received written comments by mail, e-mail, and submissions at the public meetings. Comments covered a wide spectrum of thoughts, opinions, ideas, and concerns. The BLM and Forest Service recognize that commenters invested considerable time and effort to submit comments on the Draft LUPA/EIS and developed a comment analysis method to ensure that all comments were considered as directed by NEPA regulations.

According to NEPA, the BLM and Forest Service are required to identify and formally respond to all substantive public comments. The BLM and Forest Service developed a systematic process for responding to comments to ensure all substantive comments were tracked and considered. On receipt, each comment letter was assigned an identification number and logged into CommentWorks, a Web-based database that allowed the BLM and Forest Service to organize, categorize, and respond to comments. Substantive comments from each letter were coded to appropriate categories based on the content of the comment, retaining the link to the commenter. The categories generally follow the sections presented in the Draft LUPA/EIS, though some relate to the planning process or editorial concerns.

Comments similar to each other were grouped under a topic heading, and the BLM and Forest Service drafted a statement summarizing the ideas contained in the comments. The responses were crafted to respond to the comments; a response indicates whether the commenters' points resulted in a change in the document. As a result of public comments, changes were made to the Draft LUPA/DEIS and reflect consideration given to public comments. A summary of major changes between the Draft LUPA/EIS and the Proposed LUPA/FEIS precedes each chapter in the Proposed LUPA/FEIS.

Although each comment letter was diligently considered, the comment analysis process involved determining whether a comment was substantive or nonsubstantive. In performing this analysis, the BLM and Forest Service relied on the CEQ's regulations to determine what constituted a substantive comment.

A substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy and adequacy of the information or analysis in the EIS

- Presents reasonable alternatives other than those presented in the draft EIS that meet the purpose and need of the proposed action and addresses significant issues
- Questions, with a reasonable basis, the merits of an alternative or alternatives
- Causes changes in or revisions to the proposed action
- Questions, with a reasonable basis, the adequacy of the planning process itself

Additionally, the BLM's NEPA handbook identifies the following types of substantive comments:

- Comments on the Adequacy of the Analysis—Comments that express a professional disagreement with the conclusions of the analysis or those that assert that the analysis is inadequate are substantive but may or may not lead to changes in the Final EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the manager responsible for preparing the EIS (the Authorized Officer) does not think that a change is warranted, the response should provide the rationale for that conclusion.
- Comments That Identify New Impacts, Alternatives, or Mitigation Measures—Public comments on a draft EIS that identify impacts, alternatives, or mitigation measures that were not addressed in the draft are substantive. This type of comment requires the Authorized Officer to determine whether it warrants further consideration; if so, the Authorized Officer must determine whether the new impacts, new alternatives, or new mitigation measures should be analyzed in the Final EIS, a supplement to the Draft EIS, or a completely revised and recirculated Draft EIS.
- Disagreements with Significance Determinations—Comments that directly or indirectly question, with a reasonable basis, determinations on the significance or severity of impacts are substantive. A reevaluation of these determinations may be warranted and may lead to changes in the Final EIS. If, after reevaluation, the Authorized Officer does not think that a change is warranted, the response should provide the rationale for that conclusion.

Some submissions received contained substantive comments but were out of the scope of this project. These included comments on unrelated subjects, other GRSG efforts, or BLM or Forest Service laws, rules, regulations, or policy. These comments were reviewed and sent along to the appropriate party as needed but were not included in the responses to comments.

Comments that failed to meet the above description were considered nonsubstantive. Many of those who submitted comments expressed personal opinions or preferences, their comments had little relevance to the adequacy or accuracy of the Draft LUPA/EIS, or they represented commentary on resource management without any real connection to the document being reviewed. These commenters did not provide specific information to assist the planning team in making a change to the Preferred Alternative, did not suggest other alternatives, and did not take issue with methods used in the Draft LUPA/EIS. For those reasons, they were not addressed further in this document. Examples of some of these comments are the following:

- The best of the alternatives is Alternative F (or A, B, C, D or E).
- The BLM has yet to show land stewardship at or above the level currently demonstrated by the private sector.
- Your plan does not reflect balanced land management.
- Stop giving away land to the mineral companies.
- More land should be protected as wilderness.
- I want the EIS to reflect the following for this area: no grazing, no logging, no drilling, no mining, and no OHVs.
- You need to protect all ACECs/Wild and Scenic Rivers/areas with wilderness characteristics.
- Do not add any more road closures to what is now in existence.
- People need access and the roads provide revenue for local communities.
- More areas should be made available for multiple uses (drilling, OHVs, ROWs, etc.) without severe restrictions.

Opinions, feelings, and preferences for one element or one alternative over another and comments of a personal or philosophical nature were all read, analyzed, and considered. However, because such comments are not substantive, the BLM and Forest Service did not respond to them. It is also important to note that, while all comments were reviewed and considered, they were not counted as “votes.” The NEPA public comment period is neither an election nor does it result in a representative sampling of the population. Therefore, public comments are not appropriate to be used as a democratic decision-making tool or as a scientific sampling mechanism.

Comments citing editorial changes to the document were reviewed and incorporated. The Proposed RMPA/Final EIS has been edited and revised to fix typographical errors, missing references, definitions, and acronyms and to include other clarifications as needed.

Public Comments

A total of 297 unique comment letters, forms, and e-mails were received during the 90-day public comment period. These documents resulted in 1,085 substantive comments. Out of the 297 comment letters, 193 were submitted by private individuals (65 percent); 29 by

organizations, including businesses and environmental and wildlife protection groups (10 percent); 54 by associations, including user groups, recreational clubs, realty associations, industry groups, and partnerships (18 percent); 4 by federal agencies (1 percent); 3 by state governments (1 percent); 12 by local governments (4 percent); and 2 letters were submitted anonymously (1 percent).

The BLM and Forest Service singled out 1,085 substantive comments from the 297 submissions. Private individuals submitted 111 of these comments (10 percent), organizations submitted 408 (38 percent), associations submitted 382, federal agencies submitted 59 (5 percent), state agencies submitted 53 (5 percent), and local governments submitted 72 (7 percent); there were no anonymous submissions (see **Table 6-2**, Number of Unique Submissions and Comments by Affiliation).

Table 6-2
Number of Unique Submissions and Comments by Affiliation

Group	Number of Submissions	Number of Distinct Comments
Private individuals	193	111
Organizations (including businesses and environmental and wildlife protection groups)	29	408
Associations (such as user groups, recreational clubs, realty associations, industry groups, and partnerships)	54	382
Federal agencies (EPA, USFWS, USFS, and NPS)	4	59
State government (state agencies and the Governor’s Office)	3	53
Local government (county commissions and departments)	12	72
Anonymous	2	0
Total	297	1,085

In addition to the unique submissions discussed above, 15,646 form letters were submitted during the public comment period. Form letters are exact or very close copies of a letter. They are submitted multiple times by different individuals, who may add additional language, but this usually does not substantially change the content of the letter. Often, form letters are created by an organization and sent to members, who in turn submit the letter themselves. For the Idaho and Southwestern Montana Draft LUPA/EIS, 6 distinct form letter masters were submitted, as follows:

- 2,930 letters from WildEarth Guardians
- 2,510 from the American Bird Conservancy
- 2,080 letters from Defenders of Wildlife
- 7,660 letters from the American Wild Horse Preservation Campaign
- 126 letters from local ranchers

- 5 letters from unknown organizations

One copy of each distinct letter was included in the comment analysis process as a master form letter. All of the form letters were reviewed for additional substantive content, which were included in the comment analysis process.

A review of the 1,085 substantive comments revealed a high level of interest about the following:

- Management of GRSG (346 comments, 32 percent)
- Compliance with NEPA, FLPMA, and other laws (NEPA: 136 comments, 13 percent; FLPMA: 28 comments, 3 percent; other laws: 15 comments, 1 percent)
- Livestock grazing (120 comments, 11 percent)
- Sagebrush vegetation (47 comments, 4 percent)
- Socioeconomics (39 comments, 4 percent)
- Lands and realty (35 comments, 3 percent)

Topics that received moderate interest were as follows:

- Fire and fuels (27 comments, 2 percent)
- Leasable minerals (26 comments, 2 percent)
- Travel management (20 comments, 2 percent)
- Wild horses and burros (18 comments, 2 percent)

The topics with the least interest were as follows:

- Lands with wilderness characteristics (10 comments, 1 percent)
- ACECs (10 comments, 1 percent)
- Riparian vegetation (7 comments, 1 percent)
- Predation (6 comments, 1 percent)
- Climate change (5 comments, 0.5 percent)
- Noxious and invasive weeds (4 comments, 0.4 percent)
- Recreation, tribal interests, and fish and wildlife (3 comments, 0.3 percent each)
- Water resources (2 comments, 0.2 percent)
- Locatable minerals, noise, and soil resources (1 comment, 0.1 percent each)

In addition to these topics, some commenters suggested editorial changes (62 comments, 6 percent), some submitted comments that were substantive but considered out of scope of this document (109 comments, 10 percent), and some commenters requested an extension

of the comment period (1 comment, 0.1 percent). These comments were reviewed and considered but were not included in the formal responses to comments (see **Table 6-3**, Number of Comments on the Draft LUPA/EIS by Category).

Table 6-3
Number of Comments on the Draft LUPA/EIS by
Category

Topic	Number of Comments
Greater sage-grouse	346
NEPA	136
Livestock grazing	120
Vegetation, sagebrush	47
Socioeconomics	39
Lands and realty	35
FLPMA	28
Fire and fuels	27
Leasable minerals	26
Travel management	20
Wild horses and burros	18
other laws	15
Lands with wilderness characteristics	10
ACECs	10
Vegetation, riparian	7
Predation	6
Climate change	5
Noxious and invasive weeds	4
Recreation	3
Tribal interests	3
Fish and wildlife	3
Water resources	2
Locatable minerals	1
Noise	1
Soil resources	1
Salable minerals	0
Edits*	62



**Table 6-3
Number of Comments on the Draft LUPA/EIS by
Category**

Topic	Number of Comments
Out of scope*	109
Extension requests*	1
Total	1,085
*Comments in these categories were reviewed for their content but were not included in the responses to comments.	

The comments received on the Draft LUPA/EIS were similar to the issues raised during public scoping. In many cases, commenters expressed a desire for very specific implementation level (project level) details to be included in the LUPA. As described in Chapters 1 and 2, the LUPA/EIS provides general guidance and identifies allowable uses and allocations but is not meant to address all details about individual projects. A separate environmental review will be conducted for specific projects at the implementation level to address these details. Some comments spanned several topics, included a discussion about a resource use or activity, and listed concerns about the resources that would be impacted by the use, or conversely, the impact that restrictions would have on resources.

See **Appendix T** for all substantive comments, detailed summaries, and responses organized by resource, resource use, and EIS planning regulation. An overview of these summaries and responses can be found below in **Table 6-4**, Overview of Comments by Category. Comments related to editorial changes, those that were out of scope, that requested an extension, or that were nonsubstantive were not included in the responses to comments.

**Table 6-4
Overview of Comments by Category**

<i>Topic</i>	<i>Overview</i>
ACECs	Commenters noted inconsistencies in the representation of ACECs under alternatives in the DEIS, wanted to see a greater range of alternatives for ACEC locations, and emphasized that protective actions in ACECs be adequate.
Climate change	Commenters wanted to see a more thorough and rigorous analysis of the cumulative effects of climate change on GRSG or GRSG habitat.
Fire and fuels	Commenters requested clarification on the potential impacts of the plan on fuel loads and fire risk and additional analysis of fire suppression impacts, suggested potential changes to alternatives or management actions, and recommended that additional references be incorporated to support the analysis.
Fish and wildlife	Commenters stated that the BLM fails to address avoiding the potential to list the GRSG under the Endangered Species Act and that the bird does not meet the criteria to be listed under that law.

**Table 6-4
Overview of Comments by Category**

<i>Topic</i>	<i>Overview</i>
FLPMA	Commenters claimed that the Draft LUPA/EIS failed to comply with the multiple use mandate required under FLPMA and the Multiple Use Sustained Yield Act required under the Forest Service. They also noted that the plan is not consistent with state, local, and tribal plans and policies and that there needs to be a consistency review with local plans in the document.
Greater sage-grouse	Commenters claimed the BER and NTT reports were inadequate to use as a primary source in the plan, found the plan to be inconsistent with COT conservation objectives, requested clarification on the range of alternatives and habitat mapping, suggested additional literature to be used for best available information on GRSG, made recommendations on how to improve the impact analysis of various resources on GRSG, found the cumulative impacts to be deficient, and requested clarification or revisions to mitigation measures.
Lands and realty	Commenters requested clarification on or recommended specific changes to proposed management, recommended additional references related to infrastructure, and found the analysis of impacts between lands and realty management and renewable energy infrastructure to be lacking.
Lands with wilderness characteristics	Commenters wanted additional lands with wilderness characteristics to be considered for the protection of GRSG, requested that these lands be analyzed more thoroughly, and requested additional baseline information be provided.
Leasable minerals	Commenters wanted certain aspects of the alternatives clarified, recommended additional literature to consider, and wanted a more complete analysis of impacts and cumulative impacts,
Livestock grazing	Commenters expressed concerns on retiring grazing permits, recommended expanding the range of alternatives for livestock grazing, recommended additional references to consider, and found the analysis of impacts to be inadequate.
Locatable minerals	Commenters stated that the DLUPA/DEIS failed to adequately analyze the cumulative impact of locatable mineral withdrawals across the GRSG range.
NEPA	Commenters asserted that the plan does not comply with the requirements of NEPA, did not adequately notify the public about the DEIS, did not coordinate with local agencies, did not provide a wide enough range of alternatives, did not use the best available data, and did not provide an adequate cumulative impacts analysis or mitigation measures.
Noise	Commenters questioned current studies used regarding noise and wanted to see additional information used to determine the impacts of noise on different parts of GRSG life cycle.
Noxious and invasive weeds	Commenters requested additional analysis be conducted, recommended literature to consider, asked for more baseline data, and suggested collaboration with private landowners.
Other laws	Commenters argued that the plan does not comply with other federal laws.

Table 6-4
Overview of Comments by Category

<i>Topic</i>	<i>Overview</i>
Predation	Commenters stated that the BLM does not adequately address the threat of predation or fully analyze the direct, indirect, and cumulative impacts of predation on GRSG populations.
Recreation	Commenters recommended additional management actions to limit the potential for impacts on GRSG from recreation.
Socioeconomics	Commenters claimed the analysis used was at the wrong scale to make the information meaningful and noted that the impacts analysis was inadequate.
Soil resources	One commenter noted that the DEIS lacked references to support a discussion of macrobiotic crusts.
Travel management	Commenters stated that the DEIS failed to consider a full range of travel management alternatives and suggested additional management actions and felt the DEIS did not adequately analyze the impacts of proposed management actions on travel management.
Tribal interests	Commenters requested the BLM consult with tribes regarding ACEC designations and stated that the BLM must ensure tribes maintain opportunities to access the public domain.
Vegetation, riparian	Commenters requested that the BLM and Forest Service consider additional management approaches for riparian vegetation, requested baseline data be provided, and suggested modification of current assessment methods to address GRSG needs.
Vegetation, sagebrush	Commenters recommended actions to include in the alternatives, provided additional literature to consider, stated that the DEIS inadequately analyzes impacts, including cumulative impacts, and requested clarification on mitigation and monitoring.
Water resources	Commenters stated that the DEIS fails to address impacts on the soil and watershed conditions and to provide appropriate mitigation measures.
Wild horses and burros	Commenters suggested changes in management actions, such as inclusion of the National Academy of Sciences' 2013 recommendations into the plan, requested additional baseline information, and felt the impact analysis was inadequate.

Complete responses, including rationales and any associated changes made in the Proposed LUPA/FEIS, can be found in **Appendix T**. A brief overview of changes to the document is as follows:

- The disturbance cap in the Proposed LUPA/FEIS was revised to provide additional detail, such as enhanced descriptions of what types of activities would count toward the disturbance totals, where disturbance activities would count against the cap, reclamation and habitat requirements for a disturbed area for both temporary and permanent disturbance, and how the cap would be implemented and monitored. **Appendix H** has also been added to the Proposed LUPA/FEIS, which contains preliminary disturbance inventory to more

accurately assess current disturbance levels and potential impacts across the planning area.

- A more comprehensive list of cumulative projects, past and future, has been developed and used to support a more detailed analysis of cumulative impacts. Cumulative impacts have also been reviewed for consistency with the rest of the plan.
- Language has been added to describe the adaptive management approach for the LUPA/EIS level.
- Mitigation and monitoring have been further defined as a Regional Mitigation Framework and National Monitoring Framework, detailed in **Appendices J** and **E**, respectively.
- Management objectives and actions in **Chapter 2** have been updated.
- Additional literature was reviewed and added to the baseline information in **Chapter 3**.
- **Chapter 4** has been updated with new information and analysis and was revised for consistency with **Chapter 3**.
- Clarifications have been added on specific topics commenters found confusing or deficiently described, including implementation level decisions.

All comments citing editorial changes to the document were reviewed and incorporated as appropriate. The Proposed LUPA/FEIS has been edited and revised to fix typographic errors, missing references, definitions, acronyms, calculations, and other inconsistencies.

6.2.6 Future Public Involvement

Public participation will be ongoing throughout the remainder of the LUPA/EIS process.

An NOA will be published in the *Federal Register* to notify the public of the availability of the Proposed LUPA/Final EIS. The NOA will also outline protest procedures during the 30-calendar-day protest period. The Proposed LUPA/Final EIS will be available for downloading from the project website (http://www.blm.gov/id/st/en/prog/nepa_register/sage-grouse_rmp_revision.html). The Proposed LUPA/Final EIS will also be available for review at the BLM Idaho and Montana State Offices, along with the Beaverhead-Deerlodge, Boise, Caribou-Targhee, Salmon-Challis, and Sawtooth National Forests.

The BLM and Forest Service will issue press releases to notify the public of the Proposed LUPA/Final EIS availability. All recipients of the Draft LUPA/EIS and all parties who submitted written comments on the Draft LUPA/EIS will receive the Proposed LUPA/Final EIS in either a hard copy or CD, or they will be able to download it from the website. The BLM and Forest Service will notify those who previously received the Draft RMP/EIS electronically. The BLM Idaho State Office maintains the distribution list for the Proposed LUPA/EIS, which is available on request.



The BLM and Forest Service will issue records of decision after the release of the Proposed LUPA/Final EIS, the Governor’s Consistency Review, and any resolution of protests received on the Proposed LUPA/Final EIS.

6.3 Consultation and Coordination

Various federal laws require the BLM to consult with Native American tribes, the State Historic Preservation Office, and USFWS, the US Environmental Protection Agency, and the US Department of Defense during the planning/NEPA decision-making process. This section documents the specific consultation and coordination efforts undertaken by the BLM throughout the process of developing the LUPA/EIS.

6.3.1 Cooperating Agencies

A cooperating agency is any federal, state, or local government agency or Native American tribe that enters into a formal agreement with the lead federal agency to help develop an environmental analysis. Cooperating agencies and tribes “work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks” (BLM 2005). The Forest Service defines collaboration as, “People working together to share knowledge and resources to describe and achieve desired conditions for National Forest System lands and for associated social, ecological, and economic systems in a plan area. Collaboration applies throughout the planning process, encompasses a wide range of external and internal relationships, and entails formal and informal processes” (Forest Service 2006). The benefits of enhanced collaboration among agencies in preparing NEPA analyses are:

- Disclosing relevant information early in the analytical process
- Applying available technical expertise and staff support
- Avoiding duplication with other federal, state, tribal, and local procedures
- Establishing a mechanism for addressing intergovernmental issues

The Idaho and Southwestern Montana Sub-region invited local, state, federal, and tribal representatives to participate as cooperating agencies for this LUPA/EIS. **Table 6-5**, Idaho and Southwestern Montana Sub-region Cooperating Agency Participation, provides the list of invited and accepted cooperating agencies for the sub-region. Agencies accepting invitations to be cooperating agencies sign an MOU with the BLM. The MOU outlines the interests, expertise, and jurisdictional responsibilities of both the agency and its cooperating agency partners and also outlines their respective roles and responsibilities in the planning and NEPA processes.

Cooperating agencies have been involved throughout the planning process with monthly conference calls providing project updates. In addition, cooperating agencies were given advance review of LUPA/EIS sections. Cooperating agencies will continue to be engaged throughout the planning process.

**Table 6-5
Idaho and Southwestern Montana Sub-region Cooperating Agency
Participation**

Agencies and Tribes Invited to be Cooperators	Accepted
Adams County Commissioners	
Bannock County Commissioners	
Bear Lake County Commissioners	
Beaverhead County Commissioners	✓
Beaverhead-Deerlodge National Forest	✓
Bingham County Commissioners	✓
Blackfoot Tribe of the Blackfoot Indian Reservation of Montana	
Blaine County Commissioners	✓
Boise County Commissioners	
Boise National Forest	✓
Bonneville County Commissioners	
Bureau of Indian Affairs	
Bureau of Reclamation	
Butte County Commissioners	
Camas County Commissioners	
Canyon County Commissioners	
Caribou County Commissioner	
Caribou-Targhee National Forest	✓
Cassia County Commissioners	✓
Clark County Commissioners	✓
Coeur d'Alene Tribe	
Confederated Salish and Kootenai Tribes	
Craters of the Moon National Monument	✓
Custer County Commissioners	✓
Eastern Shoshone Tribe	
Elmore County Commissioners	
Franklin County Commissioners	
Fremont County Commissioners	✓
Gem County Commissioners	
Gooding County Commissioners	
Idaho Association of Counties	✓
Idaho Department of Agriculture	
Idaho Department of Environmental Quality	
Idaho Department of Fish and Game	✓
Idaho Department of Lands	
Idaho Department of Parks and Recreation	
Idaho Department of Transportation	
Idaho Governor's Office of Species Conservation	✓
Idaho National Guard	✓
Jefferson County Commissioners	✓
Jerome County Commissioners	
Kootenai Tribe of Idaho	

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Table 6-5
Idaho and Southwestern Montana Sub-region Cooperating Agency
Participation

Agencies and Tribes Invited to be Cooperators	Accepted
Lemhi County Commissioners	✓
Lincoln County Commissioners	
Madison County Commissioners	✓
Minidoka County Commissioners	
Mountain Home Air Force Base	
Montana Fish, Wildlife and Parks	✓
Natural Resources Conservation Service	✓
Nez Perce Tribe	
Oneida County Commissioners	
Owyhee County Commissioners	✓
Payette County Commissioners	
Power County Commissioners	✓
Salmon-Challis National Forest	✓
Sawtooth National Forest	✓
Shoshone-Bannock Tribes	
Shoshone-Paiute Tribes	
Teton County Commissioners	
Twin Falls County Commissioners	✓
USDA APHIS Plant Protection and Quarantine	
USDA APHIS Wildlife Services	
US Department of Defense	✓
US Department of Energy (INL)	✓
US Fish and Wildlife Service	✓
USGS (Forest and Rangeland Ecosystem Science Center)	
Washington County Commissioners	

The BLM is aware that there are specific state laws and local plans relevant to aspects of public land management that are discrete from, and independent of, federal law. However, BLM is bound by federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA and its implementing regulations require that BLM's land use plans be consistent with officially-approved state and local plans only if those plans are consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands. Where officially-approved state and local plans or policies and programs conflict with the purposes, policies, and programs of federal law applicable to public lands, there will be an inconsistency that cannot be resolved. With respect to officially-approved state and local policies and programs (as opposed to plans), this consistency provision only applies to the maximum extent practical. While county and federal planning processes, under FLPMA, are required to as integrated and consistent as practical, the federal agency planning process is not bound by or subject to state or county plans, planning processes, policies, or planning stipulations.

6.3.2 USFWS Section 7 Consultation

Consultation with USFWS is required under Section 7(c) of the ESA before the start of any BLM or Forest Service project that may affect any federally listed or endangered species or its habitat. This LUPA process is considered to be a major project, and the Proposed LUPA/Final EIS defines potential impacts on threatened and endangered species as a result of management actions proposed in the alternatives. The USFWS is a cooperating agency in this planning process. Its staff have participated in interdisciplinary team meetings and have been provided drafts of alternative decisions and analyses for discussion and input.

The BLM and Forest Service formally initiated Section 7 consultation with a letter to the USFWS on November 19, 2013, and requested concurrence on which species would require consideration during consultation. Over the ensuing months, regular meetings were held to identify the species that would be analyzed in the biological assessment, to address which actions could affect those species, and to determine whether the implementation of the Proposed Plan “may affect” the species for which this consultation occurred.

In May 2015, the BLM and Forest Service formally submitted the biological assessment to the USFWS for review (see **Appendix Y**, Biological Assessment). The USFWS will evaluate the biological assessment and either concur with the determination via memorandum or will prepare a biological opinion. The USFWS response to this consultation process will be included in the RODs.

6.3.3 Native American Tribal Consultation

In accordance with the National Historic Preservation Act and several other legal authorities (see BLM Manual 8120), and in recognition of the government-to-government relationship between individual tribes and the federal government, the BLM has initiated Native American consultation efforts related to preparation of this LUPA. In December 2011, the BLM sent letters to tribal governments providing initial notification of the LUPA and background information on the project, an invitation to be a cooperating agency, and notification of subsequent consultation efforts related to the planning process. These letters were sent to the following tribes located in Idaho or southwestern Montana or having cultural ties to areas with GRS habitat in the sub-region:

- Blackfoot Tribe of the Blackfoot Indian Reservation of Montana
- Coeur d’Alene Tribe
- Confederated Salish and Kootenai Tribes
- Eastern Shoshone Tribe
- Kootenai Tribe of Idaho
- Nez Perce Tribe
- Shoshone-Bannock Tribes
- Shoshone-Paiute Tribes



None of the tribes have agreed to become cooperating agencies. The Shoshone-Bannock and Shoshone-Paiute tribes requested regular briefings at key milestones during the planning process. Per their request, BLM staff provided early drafts of some project documents for their review and comment under the government-to-government relationship. Other tribes have requested to be kept informed as the LUPA/EIS is developed, so that they may have an opportunity to comment. The complete Proposed LUPA/FEIS was provided to the tribes concurrently with its release to the public. Government-to-government consultation will continue throughout the LUPA process to ensure that tribal groups' concerns are considered.

Under the proposed plan, all GRSG habitat would be retained under BLM and Forest Service management unless an exchange would result in a greater benefit to GRSG or their habitat. Lands would be available for exchange with no net loss of GRSG Key habitat within PHMA and IHMA; site-specific NEPA analysis would be required for any future exchanges. Additional tribal consultation would occur during this site-specific NEPA analysis to address tribal concerns and requests regarding specific parcels.

6.3.4 State Historic Preservation Officer Consultation

As part of the NEPA scoping and consultation process, BLM and the Forest Service have notified the Idaho and Montana State Historic Preservation Officers and several Tribal Historic Preservation Officers of the proposed LUPA. The proposed LUPA does not require compliance with NHPA Section 106 because the proposed management decisions regarding greater sage grouse do not authorize specific activities that have the potential to cause as effects on historic properties. BLM will comply with the requirements of NHPA Section 106 at a later stage, i.e., for implementation-level decisions such as project proposals, which will include adequate consultation with SHPOs, THPOs, Native American Tribes, and other interested parties. The BLM's compliance with NHPA Section 106 will be performed consistent with the alternative procedures BLM agreed to in a Programmatic Agreement with the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers and the Idaho or Montana State Protocols agreed to between Idaho or Montana BLM and the SHPOs. Any future actions not covered by the BLM's national Programmatic Agreement or State Protocols may require compliance with either (a) the NHPA Section 106 regulations, or (b) a separate Section 106 agreement where applicable.

6.3.5 US Environmental Protection Agency

NEPA regulations require that EISs be filed with the US Environmental Protection Agency for review and comment (40 CFR 1506.9). The Idaho and Southwestern Montana Sub-region Draft LUPA/EIS was submitted to the US Environmental Protection Agency for review as required by CEQ regulations. The US Environmental Protection Agency provided comments on the Draft LUPA/EIS and rated the document as "Environmental Concerns—Insufficient Information (EC-2)."

6.4 List of Preparers

Table 6-6, List of Preparers, lists the name and project role of the individuals involved in the preparation of this document.

**Table 6-6
List of Preparers**

Name	Role/Responsibility
Bureau of Land Management	
Brent Ralston	Idaho State Office Project Lead, special designations lead
Jon Beck	Idaho State Office Project Lead, mineral resources, special designations
John Thompson	Montana State Office Project Lead
Joe Adamski	Forestry
Kelly Bocking	GRSG, vegetation, livestock grazing, recreation and visitor services, comprehensive trail and travel management, lands and realty, mineral resources
Bryce Bohn	Air quality, soil resources, water resources
Connie Breckenridge	GIS
Brandon Brown	Wildland fire management
Glen Burkhardt	Air quality, wildland fire management
Tim Carrigan	Lands and realty
Rod Collins	GIS
Natalie Cooper	Lands and realty
Lynn Danly	Vegetation
Robin Fehlau	Visual resources, lands with wilderness characteristics, recreation and visitor services, comprehensive trail and travel management, special designations
Vince Guyer	GRSG, wild horse and burro
Kirk Halford	Cultural resources, paleontological resources
Lara Hannon	Vegetation
Jon Haupt	Livestock grazing
Sara Heide	Wildland fire management
Terry Heslin	Comprehensive trail and travel management
Scott Hoefler	Special status species, fish resources
Gloria Jakovac	Lands and Realty
Steve Jirik	Vegetation, wildland fire management
Brandon Knapton	Special status species
Kevin Knauth	Wildland fire management
Michael Kuyper	Vegetation, livestock grazing, mineral resources
Stephen Leonard	Wild horse and burro
Nika Lepak	Wild horse and burro, livestock grazing
Don Major	Vegetation, wildlife resources
Paul Makela	GRSG, special status species, wildlife resources, lands and realty
Clint McCarthy	Vegetation
Diane McConaughy	GIS
Kelly Moore	Lands and realty
Karen Porter	Mineral resources
Kasey Prestwich	Lands and realty

**Table 6-6
List of Preparers**

Name	Role/Responsibility
Jesse Rawson	GRSG
Tom Rinkes	GRSG, wildlife resources
Chris Robbins	Livestock grazing
Bruce Schoeberl	Fish resources
Elena Shaw	Vegetation, livestock grazing
Steve Shaw	Wildland fire management
Dick Todd	Lands and realty
Jason Wright	Vegetation, wildland fire management
Cheryle Zwang	Cultural resources
Forest Service Nest Members	
Rob Mickelsen	Idaho Project Lead, vegetation
Dustin Bambrough	Livestock grazing
Pam Bode	NEPA/planning
Chris Colt	Special status species, wildlife
Dale Harber	Minerals specialist
Kolleen Kralick	Cultural resources, Native American tribal interests
Tim Love	GIS
Tim Metzger	Wildland fire management
Cory Norman	Wildland fire management
David Reis	Comprehensive trails and travel management
Consultant - EMPSi	
Meredith Zaccherio	Project Manager, biological resources lead
Angie Adams	Special designations, wilderness characteristics
David Batts	Project Advisor
Constance Callahan	Quality Assurance, editing
Amy Cordle	Air quality
Annie Daly	Air quality, special designations, wilderness characteristics
Andrew Gentile	Soil resources, water resources
Zoe Ghali	Forestry, livestock grazing, wild horse and burro, wildland fire management
Peter Gower	Comprehensive trails and travel management, lands and realty, recreation and visitor services, visual resources
Brandon Jensen	Fish resources, wildlife resources
Matt Kluvo	Vegetation, forestry, paleontological resources
Kate Krebs	Visual resources
Laura Long	Technical editing
Carol-Anne Murray	Cultural resources, Native American tribal interests, paleontological resources
Katie Patterson	Minerals (coal, fluid minerals, locatable minerals, mineral materials, nonenergy leasable minerals)
Holly Prohaska	Livestock grazing, wild horse and burro
Marcia Rickey	GIS
Chad Ricklefs	Lands and realty
Cindy Schad	Word processing
Jordan Tucker	Soil resources, water resources

**Table 6-6
List of Preparers**

Name	Role/Responsibility
Drew Vankat	Wildland fire management, recreation and visitor services, comprehensive trails and travel management
Jennifer Whitaker	Minerals (coal, fluid minerals, locatable minerals, mineral materials, nonenergy leasable minerals)
Liza Wozniak	GRSG, special status species
Consultant – ICF International	
Robert Fetter	Project Manager-Socioeconomics and Environmental Justice
Alex Uriarte	Socioeconomics and Environmental Justice Specialist
Elizabeth Kurz	Project Assistance
Alison Carey	Project Assistance