
Chapter 6

Consultation and Coordination

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CHAPTER 6

CONSULTATION AND COORDINATION

6.1 INTRODUCTION

This chapter describes the public outreach and participation opportunities made available through the development of this LUPA/EIS and consultation and coordination efforts with tribes, government agencies, and other stakeholders. This chapter also lists the agencies, organizations, and individuals that received a copy of the LUPA and associated EIS.

The BLM land use planning activities are conducted in accordance with NEPA requirements, CEQ regulations, and Department of the Interior and BLM policies and procedures implementing NEPA. The NEPA and associated laws, regulations, and policies require the BLM to seek public involvement early in, and throughout, the planning process to develop a reasonable range of alternatives to proposed actions and to prepare environmental documents that disclose the potential impacts of proposed actions and alternatives. Public involvement and agency consultation and coordination, which have been at the heart of the planning process leading to this LUPA/EIS, were achieved through Federal Register notices, public and informal meetings, individual contacts, media releases, planning bulletins, and the Northwest Colorado GRSG website (http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse.html).

6.2 CONSULTATION AND COORDINATION

Federal laws require the BLM and Forest Service to consult with certain federal and state agencies and entities and Native American tribes (40 CFR 1502.25) during the NEPA decision-making process. The BLM and Forest Service are also directed to integrate NEPA requirements with other environmental review and consultation requirements to reduce paperwork and delays (40 CFR 1500.4-5).

In addition to formal scoping (**Section 6.5.1**, Scoping Process), as summarized below, the BLM has implemented an extensive collaborative outreach and public involvement process that has included coordinating with cooperating agencies,

holding public scoping meetings, holding public meetings on the Draft LUPA/EIS, and holding a socioeconomic workshop. The BLM will continue to meet with interested agencies and organizations throughout the planning process, as appropriate, and will continue coordinating closely with cooperating partners.

6.2.1 Native American Tribal Consultation

The BLM began tribal consultation for cultural resources for the planning process through a consultation initiation letter that was sent to the following tribes on June 19, 2012:

- Eastern Shoshone Tribe (Wind River Reservation)
- Northern Arapaho Tribe
- Northern Cheyenne Tribe
- Southern Ute Indian Tribe
- Ute Indian Tribe (Uintah and Ouray Reservation)
- Ute Mountain Ute Tribe

No written comments were received from tribal agencies during the scoping period, during the public comment period on the Draft LUPA/EIS, or after the consultation initiation letters were sent; tribal concerns or issues have been typically presented in oral format. Government-to-government consultation will continue throughout the LUPA process to ensure that tribal groups' concerns are considered during LUPA development.

The Proposed LUPA/Final EIS will be provided to the tribes concurrently with its release to the public.

6.2.2 Colorado State Historic Preservation Officer Consultation

Cultural resource consultation with the Colorado State Historic Preservation Office occurred early in the planning process. A letter was sent to the Colorado State Historic Preservation Officer on January 24, 2012, requesting participation as a cooperating agency and feedback regarding the development of the Draft LUPA; no response has been received. The Proposed LUPA/Final EIS will be provided to the Colorado State Historic Preservation Office concurrently with its release to the public.

6.2.3 US Fish and Wildlife Service Consultation

To comply with Section 7(c) of the ESA, the BLM consulted USFWS early in the planning process. USFWS provided input on planning issues, data collection and review, and alternatives development in their role as a cooperating agency. The BLM and Forest Service have consulted with USFWS to develop the Biological Assessment (**Appendix L**) and Forest Service Biological Evaluation (**Appendix M**), which were submitted to USFWS in May 2015. The Biological Opinion is anticipated from USFWS in approximately July 2015.

6.3 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. More specifically, cooperating agencies “work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks” (BLM Land Use Planning Handbook H-1601-1).

On January 20, 2012, the BLM wrote to 80 local, state, federal, and tribal representatives, inviting them to participate as cooperating agencies for the Northwest Colorado GRSG LUPA/EIS. Twenty-two agencies agreed to participate on the EIS as designated cooperating agencies, all of which have signed MOUs with the Northwest District Office (**Table 6.1**). Some agencies are participating as Cooperating Agencies under the larger umbrella of the national-level MOUs described below.

Table 6.1
Cooperating Agencies

Agencies and Tribes Invited to be Cooperators	Agencies that Accepted	Agencies that signed MOUs
Counties		
Garfield County	X	X
Eagle County		
Grand County	X	X
Jackson County	X	X
Mesa County	X	X
Moffat County	X	X
Rio Blanco County	X	X
Routt County	X	X
Summit County		
Municipalities		
City of Fruita		
Town of Craig		
Town of Debeque		
Town of Eagle	X	
City of Glenwood Springs		
City of Grand Junction		
Town of Gypsum		
Town of Hayden		
Town of Hot Sulphur Springs		
Town of Kremmling		
Town of Meeker	X	
Town of New Castle		
Town of Oak Creek		
Town of Palisade		
Town of Parachute		
Town of Rangely		

Table 6.1
Cooperating Agencies

Agencies and Tribes Invited to be Cooperators	Agencies that Accepted	Agencies that signed MOUs
Town of Rifle		
Town of Silt		
Town of Steamboat Springs		
Town of Walden		
Town of Yampa		
State Agencies		
Colorado Department of Natural Resources	X	X
Colorado Department of Transportation—State Office		
Colorado Department of Transportation—Region 3		
Colorado Department of Parks and Wildlife ¹	X	X
Colorado Oil and Gas Commission		
CPW—Meeker	X	X
CPW—Glenwood Springs	X	X
CPW—Hot Sulphur Springs	X	X
CPW—Steamboat Springs	X	X
Colorado Public Utilities Commission		
Colorado Division of Reclamation Mining and Safety ²		
Colorado River Water Conservation District		
Colorado State Historic Preservation Officer		
Colorado Water Conservation Board		
Colorado Water Science Center		
Colorado Air Pollution Control Division		
Denver Water Board	X	X
Federal Railway Administration Region 6 Headquarters		
Northern Colorado Water Conservation District		
Juniper Water Conservation District		
White River and Douglas Creek Conservation Districts	X	X
Federal Agencies		
Arapaho National Wildlife Refuge ³	X	X
Dinosaur National Monument		
Natural Resource Conservation Service State Office	X	X
Natural Resource Conservation Service Kremmling Field Office	X	X
Natural Resource Conservation Service Walden Field Office	X	X
Office of Surface Mining Reclamation and Enforcement		
US Bureau of Reclamation		
US Army Corps of Engineers		
US EPA NEPA Program		
USFWS	X	X
Arapahoe/Roosevelt National Forest		
White River National Forest		
Medicine Bow-Routt National Forest ⁴	X	X
US Geographical Survey		

Table 6.1
Cooperating Agencies

Agencies and Tribes Invited to be Cooperators	Agencies that Accepted	Agencies that signed MOUs
Tribes		
Eastern Shoshone Tribe—Wind River Reservation		
Northern Arapaho Tribe		
Northern Cheyenne Tribe		
Ute Indian Tribe—Uintah and Ouray Reservation		
Southern Ute Indian Tribe		
Ute Mountain Ute Tribe		
Other		
Associated Governments of Northwest Colorado	X	X

¹ All branches of CPW are participating as a cooperating agency under the umbrella of the Colorado Department of Natural Resources.

² Colorado Division of Reclamation, Mining and Safety are participating as a cooperating agency under the umbrella of the Colorado Department of Natural Resources.

³ Arapaho National Wildlife Refuge is participating as a cooperating agency under the umbrella of the USFWS National MOU.

⁴ The Medicine Bow-Routt National Forest is participating as a cooperating agency under the umbrella of the Forest Service National MOU.

The Forest Service and USFWS are participating in the EIS process as cooperating agencies at a national level, and both agencies have signed MOUs at a national level.

Since starting on May 18, 2012, the BLM has conducted nine meetings to date with cooperating agencies. Cooperating agencies were also encouraged to attend the scoping open houses and public meetings on the Draft LUPA/EIS and provide comments during the scoping period (**Section 6.5.1**, Scoping Process) and during the public comment period. These agencies have been engaged throughout the planning process, including during alternatives development and during development of the Proposed LUPA/Final EIS.

6.4 COORDINATION AND CONSISTENCY

The BLM's planning regulations (43 CFR 1610) require that its RMPs be consistent with officially approved or adopted resource-related plans of other federal, state, local, and tribal governments, to the extent that those plans are consistent with federal laws and regulations applicable to public lands. Plans formulated by federal, state, local, and tribal governments that relate to management of lands and resources have been reviewed and considered as the LUPA/EIS has been developed. These plans can be found in **Chapter I, Section I.7**, Relationship to Other Policies, Plans, and Programs.

The BLM and Forest Service are 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, the BLM and Forest Service are bound by federal law. As such, there may be inconsistencies that cannot be

reconciled. The FLPMA and its implementing regulations require that the 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 be 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.

6.5 PUBLIC INVOLVEMENT

Public involvement is a vital and legal component of both the LUPA and EIS processes. Public involvement vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 CFR Section 1506.6, thereby ensuring that federal agencies make a diligent effort to involve the public in the NEPA process. Section 202 of the FLPMA directs the Secretary of the Interior to establish procedures for public involvement during land use planning actions on public lands. These procedures can be found in the BLM's Land Use Planning Handbook (H-1601-1). Public involvement for the Northwest Colorado GRSG LUPA/EIS includes the following four phases:

- Public scoping before NEPA analysis begins to determine the scope of issues and alternatives to be addressed in the LUPA/EIS
- Public outreach via news releases
- Collaboration with federal, state, local, and tribal governments and cooperating agencies
- Public review of and comment on the draft LUPA/EIS, which analyzes likely environmental effects and identifies the BLM's preferred alternative.

The public scoping phase of the process has been completed and is described in **Section 6.5.1**, Scoping Process. The public outreach and collaboration phases are ongoing throughout the LUPA/EIS process. Information about the process can be obtained by the public at any time on the Northwest Colorado GRSG website (http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse.html). This website contains background information about the project, a public involvement timeline and calendar, maps and photos of the planning area, and copies of public information documents released throughout the LUPA/EIS process.

6.5.1 Scoping Process

The formal public scoping process for the LUPA/EIS began on December 9, 2011, with the publication of the Notice of Intent in the Federal Register (76 *Federal Register* 2011-31652, December 9, 2011). The Notice of Intent notified the public of the BLM's intent to develop LUPAs for the management of GRSG and initiated the public scoping period, which closed on March 23, 2012.

News Release

A news release was provided to local news organizations on January 15, 2012. This news release announced the scoping period for the LUPA/EIS process and provided information about the open houses.

Scoping Open Houses

The BLM hosted four open houses to provide the public with opportunities to become involved, learn about the project and the planning process, meet the LUPA team leaders, and offer written comments. The public was notified of the open houses by news release and on the Northwest Colorado GRSG website: http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse.html.

Information on the open houses is provided in **Table 6.2**.

Table 6.2
Scoping Open House Information

Venue	Location (Colorado)	Date	Number of Attendees
The Wattenburg Center	Walden	January 31, 2012	36
Sheraton Denver West	Lakewood	February 1, 2012	17
Colorado River Valley Field Office	Silt	February 2, 2012	12
Little Snake Field Office	Craig	February 3, 2012	24
		Total	89

Note: All meetings were held from 4:00 to 7:00 pm.

Scoping meetings were held in an open house format to encourage participants to discuss concerns and questions with the BLM staff representatives. The BLM gave a short presentation to provide an overview of the LUPA process and present information about public involvement opportunities. GRSG occupied habitat maps were shown to give an idea of the lands that might be affected by the planning decisions. Copies of the NTT Report and scoping comment forms were available. A total of 89 people attended the open houses.

Scoping Comments Received

The BLM Colorado received over 100 unique written submissions containing 516 separate comments during the public scoping period. Detailed information about the comments received and about the public outreach process can be found in the National Greater Sage-Grouse Planning Strategy Scoping Summary Report, finalized in May 2012 (BLM 2012). The issues identified during public scoping and outreach helped refine the list of planning issues, included in

Section 1.5.2, Issues Identified for Consideration in the Northwest Colorado Greater Sage-Grouse Land Use Plan Amendments, which guided the development of alternative management strategies for the LUPA.

6.5.2 Project Website

The BLM maintains an interactive website to provide the public with the latest information about the LUPA/EIS process. The website, available at http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse.html, provides background information about the project, a public involvement timeline and calendar, maps of the planning area, and copies of public information documents such as the Notice of Intent and press releases.

6.5.3 Mailing List

The BLM compiled a mailing list of several hundred individuals, agencies, and organizations that had participated in past BLM projects within the Northwest District. Attendees at the scoping open houses were added to the mailing list if they chose to receive or continue to receive project information. In addition, all individuals or organizations who submitted scoping comments were added to the mailing list. Requests to be added to or to remain on the official LUPA distribution list will continue to be accepted throughout the planning process.

6.5.4 Public Comment on the Draft Land Use Plan Amendment/ Environmental Impact Statement

Public Meetings

A Notice of Availability of the Draft LUPA/EIS was published in the Federal Register on August 16, 2013. The NOA initiated a 90-day public comment period, which was extended to December 2, 2013, resulting in a 108-day comment period. The BLM and Forest Service notified the public of open house meetings via the project website and a news release to media sites, including newspapers, radio, and television.

The BLM and Forest Service held four public comment open houses for the Draft LUPA/EIS from October 22 to 29, 2013, as shown in **Table 6.3**.

Table 6.3
Public Comment Open House Information

Venue	Location (Colorado)	Date	Number of Attendees
The Wattenburg Center	Walden	October 22, 2013	13
Lakewood Heritage Center	Lakewood	October 23, 2013	30
Colorado River Valley Field Office	Silt	October 28, 2013	24
Craig Hospital	Craig	October 29, 2013	33
		Total	100

Note: All meetings were held from 4:00 to 7:00 pm.

All meetings were held from 4:00 to 7:00 pm. 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 resulting from the alternatives. At the open houses, displays introduced the various resource topics and presented the alternatives for the resource topics. Other displays explained the NEPA process and the methods for submitting comments. A slide show presentation was given by BLM personnel twice during the meeting, describing the 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 108-day public comment period to receive comments on the Draft LUPA/EIS. The BLM and Forest Service received written comments by mail, email, fax, 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 methodology 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. Upon 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 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 or not 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/Final EIS can be found in **Section 1.10**, Changes between the Draft LUPA/EIS and the Proposed LUPA/Final EIS.

Although each comment letter was diligently considered, the comment analysis process involved determining whether a comment was substantive or nonsubstantive in nature. 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 of the information and/or analysis in the EIS
- Questions, with a reasonable basis, the adequacy of the information and/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 assert that the analysis is inadequate are substantive in nature 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 BLM 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 it does, the BLM 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 regarding 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 BLM 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 subjects not related to this effort, 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 are not included in the comment response for this effort.

Comments that failed to meet the above descriptions were considered nonsubstantive. Many comments received throughout the process expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the Draft LUPA/EIS, or represented commentary regarding resource management without any real connection to the document being reviewed. These comments did not provide specific information to assist the planning team in making a change to the preferred alternative, did not suggest other alternatives, did not take issue with methods used in the Draft LUPA/EIS, and are not addressed further in this document. Examples of some of these comments include the following:

- The best of the alternatives is Alternative D (or A, B, or C).
- 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 (e.g., drilling, OHVs, and ROWs) without severe restrictions.

Opinions, feelings, and preferences for one element or one alternative over another, and comments of a personal and/or philosophical nature were all read, analyzed, and considered, but because such comments are not substantive in

nature, the BLM and Forest Service did not respond to them. It is also important to note that while all comments were reviewed and considered, comments were not counted as “votes.” The NEPA public comment period is neither considered 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 LUPA/Final EIS has been extensively technically edited and revised to fix typos, missing references, definitions, and acronyms, and other clarifications as needed.

Public Comments

A total of 329 unique comment letters, forms, and emails were received during the 108-day public comment period. These documents resulted in 473 substantive comments. Of the 329 comment letters, 260 (79 percent) were submitted by private individuals; 60 (18 percent) were submitted by organizations, including businesses and environmental and wildlife protection groups; 2 (less than 1 percent) were submitted by federal agencies; 5 (2 percent) were submitted by local governments; and 2 (less than 1 percent) were anonymous. The BLM and Forest Service parsed 473 substantive comments from the 329 submissions. Private individuals submitted 34 (7 percent) of these comments, organizations submitted 321 (68 percent) of these comments, federal agencies submitted 56 (12 percent) of these comments, and local governments submitted 62 (13 percent) of these comments. None of the anonymous submissions contained substantive comments (**Table 6.4**).

Table 6.4
Number of Unique Submissions and Comments by Affiliation

Group	Number of Submissions	Number of Comments
Private individuals	260	34
Organizations (including businesses and environmental and wildlife protection groups)	60	321
Federal agencies (EPA, USFWS, Forest Service, NPS)	2	56
Local government (county commissions and departments)	5	62
Anonymous	2	0
Total	329	473

In addition to the unique submissions discussed above, 7,270 form letters were submitted during the public comment period. Form letters are exact or very close copies of a letter that are submitted multiple times by different individuals; individuals may add additional language to the letter, but this usually does not substantially change the content of the letter. Often, form letters are created by an organization and sent to their members, who in turn submit this letter to the planning effort. For the Northwest Colorado Greater Sage-Grouse Draft

LUPA/EIS, 7 different form letter masters were submitted: 1,860 letters from American Bird Conservancy; 2,290 letters from WildEarth Guardians; 560 letters from Conservation Colorado; 590 letters from National Wildlife Federation; 1,080 letters from Sierra Club; 450 letters from National Audubon Society; and 440 letters from Wilderness Society. One copy of each of these letters was included in the comment analysis process as a master form letter. All of the form letters were reviewed for additional substantive content; this was included in the comment analysis process when present.

The 473 substantive comments were focused primarily on GRSG management (136 comments, 29 percent); compliance with NEPA, FLPMA, and other laws (NEPA: 105 comments, 22 percent; other laws: 8 comments, 2 percent; and FLPMA: 15 comments, 3 percent); socioeconomics (41 comments, 9 percent); livestock grazing (29 comments, 6 percent); and mineral development (locatable minerals: 2 comments, less than 1 percent; and leasable minerals: 26 comments, 6 percent). Other topics of interest were sagebrush vegetation (8 comments, 2 percent), fire and fuels (5 comments, 1 percent), and lands and realty (4 comments, 1 percent). Topics that received moderate interest were climate change (3 comments, less than 1 percent), travel management (3 comments, less than 1 percent), and riparian vegetation and water resources (6 comments, 1 percent each). The topics with the least amount of interest (all less than 1 percent) were air resources (2 comments), lands with wilderness characteristics (2 comments), predation (1 comment), recreation (1 comment), soil resources (1 comment), wild horse and burros (1 comment), and noxious and invasive weeds (1 comment). In addition to these topics, some comments (40 comments, 9 percent) suggested editorial changes, were substantive comments but considered out of scope of this document (31 comments, 7 percent), or requested an extension of the comment period (2 comments, less than 1 percent). These comments were reviewed and considered but are not included in the formal comment-response effort. See **Table 6.5**.

The comments received on the Draft LUPA/EIS were similar to the issues raised during public scoping. In many cases, comments 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 the details of 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 and included a discussion about a resource use or activity and concerns about that use or activity's impacts on various resources, or, conversely, concerns about impacts of restricting that use or activity.

All substantive comments, detailed summaries, and responses organized by resource, resource use, or EIS planning regulation can be found in **Appendix P**,

Table 6.5
Number of Comments on the Draft LUPA/EIS by
Category

Topic	Number of Comments
GRSG	136
NEPA	105
Socioeconomics and Environmental Justice	41
Livestock Grazing	29
Leasable Minerals	26
FLPMA	15
Other Laws	8
Vegetation – Sagebrush	8
Fire and Fuels	5
Lands and Realty	4
Climate Change	3
Travel Management	3
Vegetation – Riparian	3
Water	3
Air Resources	2
Locatable Minerals	2
Lands with Wilderness Characteristics	2
Predation	1
Recreation	1
Soil	1
Wild Horse and Burros	1
Noxious and Invasive Weeds	1
Edits*	40
Out of scope*	31
Comment period extension requests*	2
Total	473

*Comments in these categories were reviewed for their content but are not included in the comment-response effort.

Response to Comments on the Draft Land Use Plan Amendment/Environmental Impact Statement. An overview of these summaries and responses is in **Table 6.6**. Comments related to editorial changes, out-of-scope topics, and comment period extension requests, as well as nonsubstantive comments, were not included in the comment-response effort.

Complete responses, including rationale and any associated changes made in the Proposed LUPA/Final EIS, can be found in **Appendix P**, Response to Comments on the Draft Land Use Plan Amendment/Environmental Impact Statement. A brief overview of changes to the document is provided in **Chapter I**, Introduction, **Section I.10**, Changes Between the Draft Land Use Plan Amendment/Environmental Impact Statement and Proposed Land Use Plan Amendment/Final Environmental Impact Statement.

Table 6.6
Overview of Comments by Category

Category	Overview of Substantive Comments Received
Climate change	Commenters wanted a more thorough and rigorous analysis of climate change in the alternatives, as well as analysis of the potential effectiveness of climate change management actions on lessening the threat to GRSG.
Fire and fuels	Commenters requested changes to alternatives to exclude habitat loss due to wildfires in the disturbance cap, to apply seasonal restrictions to all ADH, and to include risk analysis of prescribed burn/natural-ignition fire.
FLPMA	Commenters stated that the Draft LUPA/EIS failed to comply with the multiple-use mandate required under the FLPMA (BLM) and the Multiple Use Sustained Yield Act (Forest Service). Commenters also noted that the Draft LUPA/EIS is inconsistent with state, local, and tribal plans and policies, and that the document needs to provide a consistency review with local plans.
GRSG	Commenters had two opposing views regarding the NTT and COT reports. Many claimed the NTT and/or COT report was inadequate to use as a primary source in the Draft LUPA/EIS. Others questioned why the alternatives were not directly taken from actions suggested in the NTT and/or COT report.
Lands and realty	Commenters recommended retention and acquisition of PHMA. Commenters claimed that the BLM and Forest Service did not use scientific studies when establishing the areas around leks, and that BLM and Forest Service need to double check the miles of transmission line presented in Table 3-14, Miles of Transmission Lines within GRSG Habitat in the Planning Area , because the numbers appear to overestimate the amount of lines.
Lands with wilderness characteristics	Commenters requested an evaluation and inventory of potential lands with wilderness characteristics.
Leasable minerals	Commenters requested additional actions or clarifications of existing actions within the range of alternatives. Commenters claimed that some management actions are noncompliant with current management policies and guidance. Commenters claimed that the oil and gas analysis was overly biased in presenting adverse effects from oil and gas development on GRSG and requested consideration of additional literature.
Livestock grazing	Commenters were divided about changes to alternatives. Many commenters requested changes to livestock grazing alternatives to be more consistent with BLM's multiple-use mandate and to incorporate range BMPs that are focused on sound management. Other commenters requested that the livestock grazing alternatives include terms and conditions for grazing permits that assure that GRSG habitat requirements are met, that alternatives are consistent with NTT recommendations, and that conservation measures prevent adverse impacts from livestock range improvement projects on GRSG habitat. Commenters also suggested additional references, requested additional analysis of the alternatives' impacts on livestock grazing, and requested additional analysis of livestock grazing impacts on GRSG.
Locatable minerals	The USFWS requested additional mitigation measures for locatable minerals (mining operations) for consideration in the range of alternatives.

Table 6.6
Overview of Comments by Category

Category	Overview of Substantive Comments Received
NEPA	Commenters asserted that the Draft LUPA/EIS does not comply with the requirements of NEPA, does not provide a wide enough range of alternatives, does not use the best available data, or does not provide adequate cumulative impacts analysis or mitigation measures. Commenters questioned the methodology used to calculate the disturbance cap. Commenters asserted that the BLM/Forest Service did not adequately notify the public about the Draft LUPA/EIS and did not coordinate with local agencies.
Other Laws	Commenters stated that the Draft LUPA/EIS does not comply with other federal laws.
Predation	Commenters questioned why the BLM and Forest Service did not include the threat of predation in the Draft LUPA/EIS.
Recreation	Commenters claimed that the Draft LUPA/EIS contains conflicting impact analysis statements regarding the effects of closures and restrictions on dispersed camping and other recreational activities.
Socioeconomics	Commenters requested that the baseline data be revised to include more current and relevant data, claimed the analysis used was at the wrong scale to make the information meaningful, and noted that the impact analysis was inadequate.
Soil resources	Commenters claimed that the Draft LUPA/EIS fails to consider the effects of livestock grazing in erosion calculations and plant community degradation.
Travel management	Commenters claimed the Draft LUPA/EIS failed to change unrestricted motorized travel or open motorized routes to protect GRSG, stating that it is noncompliant with the BLM's open road minimization requirements. Commenters requested that the BLM clarify how to measure adverse effects on GRSG.
Vegetation – riparian	Commenters suggested that the BLM and Forest Service consider management actions to address pinyon-juniper incursions within the range of alternatives.
Vegetation – sagebrush	Commenters suggested that the BLM and Forest Service include additional conservation measures from the COT, including controls for preventing the spread of invasive, nonnative plants in one or more alternatives.
Water resources	Commenters claimed that the impact analysis was based on the inaccurate assumption that all streams and waterbodies are currently meeting State Water Quality Standards and requested additional baseline information on 303(d) listed streams.
Wild horses and burros	Commenters requested that the BLM link the Colorado Monitoring Framework with vegetation studies and that AMLs for drought conditions be considered within the range of alternatives.

6.5.5 Future Public Involvement

Public participation efforts will be ongoing throughout the remainder of the LUPA process. This Proposed LUPA/Final EIS responds to all substantive comments received during the comment period on the Draft LUPA/EIS. 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, RODs will be issued by the BLM and Forest Service.

6.6 LIST OF PREPARERS

Specialists who prepared this LUPA/EIS are provided in **Table 6.7**.

Table 6.7
Preparers

Name	Role/Responsibility
Northwest District Office	
Joseph Meyer	Northwest District Manager
Jim Cagney	Northwest District Manager (Retired)
Erin Jones*	LUPA/EIS Lead
Bridget Clayton	LUPA/EIS Lead
Jerome Fox*	Wild Horse and Burro Management
Northwest Colorado Fire Management Unit	
James Michels*	Wildland Fire Ecology and Management
Colorado River Valley Field Office	
Karl Mendonca	Field Manager (Acting)
Steve Bennett	Field Manager (Retired)
Pauline Adams	Minerals – Locatable and Salable, Soil Resources
Allen Crockett*	Minerals – Leasable and Coal
Carla DeYoung	Vegetation (Noxious Weeds, Riparian, Wetlands)
Lathan Johnson	Wild land Fire Ecology and Management
Shauna Kocman	Water Resources
Erin Leifeld*	Cultural Resources, Paleontological Resources
Julie McGrew	Visual Resources, Soundscapes
Kim Miller	Recreation, Special Designations
Christina O'Connell	GIS
Sylvia Ringer	Special Status Species, Fish and Wildlife
Todd Sieber	Minerals – Leasable and Coal, Paleontological Resources
Greg Wolfgang	Travel Management
Grand Junction Field Office	
Katie Stevens	Field Manager
Doug Diekman	GIS
Scott Gerwe	Minerals – Leasable, Coal, Locatable, Salable, Paleontological Resources
Lathan Johnson	Wild land Fire Ecology and Management
Robin Lacy	Lands and Realty
Alissa Leavitt-Reynolds	Cultural Resources
Anna Lincoln	Vegetation (Noxious Weeds, Riparian, Wetlands)
Jacob Martin	Range Management, Wild Horse and Burro Management
Chris Pipkin	Travel Management, Recreation, Special Designations, Visual Resources, Soundscapes
Heidi Plank	Special Status Species, Fish and Wildlife
Kremmling Field Office	
Stephanie Odell	Field Manager
Paula Belcher	Vegetation (Noxious Weeds, Riparian, Wetlands), Water Resources, Soil Resources

Table 6.7
Preparers

Name	Role/Responsibility
Kelly Elliott	Minerals – Leasable, Coal
Zach Hughes	Vegetation (Noxious Weeds, Riparian, Wetlands)
John Monkouski*	Travel Management, Recreation, Special Designations, Soundscapes
Hannah Schechter	Visual Resources
Annie Sperandio	Lands and Realty
Kevin Thompson	Wild land Fire Ecology and Management
Sue Valente	GIS
Bill Wyatt	Cultural Resources, Paleontological Resources
Little Snake Field Office	
Wendy Reynolds	Field Manager
Desa Ausmus	Special Status Species, Fish and Wildlife
Dale Beckerman	Wild land Fire Ecology and Management
Pam Levitt	GIS
Jennifer Maiolo*	Minerals – Locatable and Salable
Kathy McKinstry	Wild Horse and Burro Management
Louise McMinn	Lands and Realty
Gina Robison	Travel Management, Recreation, Special Designations, Visual Resources, Soundscapes
Hunter Seim	Noxious Weeds and General Vegetation, Range Management
Shawn Wisner	Minerals – Leasable and Coal
White River Field Office	
Kent Walter	Field Manager
Eric Allen	GIS
Lisa Belmonte*	Special Status Species, Fish and Wildlife
Kristen Bowen	Cultural Resources, Paleontological Resources
Stacey Burke*	Lands and Realty
Matt Dupire*	Vegetation (Noxious Weeds, Riparian, Wetlands), Range Management
Melissa Kindall	Wild Horse and Burro Management
Bob Lange	Water Resources, Soil Resources
James Roberts	Soundscapes
Colorado State Office/National Operations Center	
Ruth Welch	State Director
Chad Meister*	Air Quality and Climate Change
Josh Sidon	Socioeconomics, Environmental Justice
Megan Stouffer	NEPA/Planning Oversight
Forest Service Team	
Glen Stein	Management Oversight/Special Designations
Kolleen Kralick	Forest Service Colorado Liaison/Cultural & Paleontological Resources
Pam Bode	Planning Oversight, Climate Change
Chris Colt	Special Status Species, Fish and Wildlife, Water Resources
Dustin Bambrough	Vegetation, Range Management, Soil Resources
Madelyn Dillon	Lands and Realty
Tim Metzger	Wildland Fire Ecology
Chris Miller	Social and Economic Conditions

Table 6.7
Preparers

Name	Role/Responsibility
David Reis	Travel Management, Recreation, Visual Resources, Soundscapes
Apple Snider	Special Status Species
EMPSi Team	
Angie Adams	Project Manager
Annie Daly	Project Support
Nick Engelman	508 Compliance
Kate Krebs	Project Support
Laura Long	Editor
Kevin Rice	GRSG Cumulative Impacts Author
Cindy Schad	Word Processor
Drew Vankat	Project Support for Baseline Environmental Report and Cumulative Impacts
Randy Varney	Editor
Jennifer Whitaker	Project Support
Liza Wozniak	GRSG Cumulative Impacts Author
Meredith Zaccherio	GRSG Cumulative Impacts Reviewer
ICF International Team	
Rob Fetter	Project Manager – Socioeconomics
Alex Uriarte	Project Assistance
Roy Allen	Project Assistance

* Denotes BLM Core Team Member

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