



U.S. Department of the Interior  
Bureau of Land Management

# Preliminary Alternatives and Draft Basis for Analysis Comment Report

Royal Gorge Field Office

## Eastern Colorado Resource Management Plan





# **Preliminary Alternatives and Draft Basis for Analysis Comment Report**

## **Eastern Colorado Resource Management Plan**

**Prepared by**

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## **ACRONYMS AND ABBREVIATIONS**

ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
CSU	Controlled surface use
ECRMP	Eastern Colorado Resource Management Plan
EIS	Environmental impact statement
IP	Internet protocol
MLP	Master leasing plan
NEPA	National Environmental Policy Act
NSO	No surface occupancy
RMP	Resource management plan
USFWS	U.S. Fish and Wildlife Service

## 1.0. INTRODUCTION

On March 8, 2017, the Bureau of Land Management (BLM) released the *Preliminary Alternatives Report* and the *Draft Basis for Analysis* for the Eastern Colorado Resource Management Plan (ECRMP). This initiated a public review period during which the public could raise any concerns and provide input before the BLM analyzed the impacts of the draft management plan alternatives. The purpose of this document is to report the number and types of public comments received and summarize all substantive comments by issue categories.

The public review period ended on May 5, 2017. During the review period, the BLM hosted eight public meetings throughout the planning area in Denver, Fairplay, Salida, Cañon City, Colorado Springs, Walsenburg, Greeley, and Leadville, Colorado. The BLM posted the meetings dates and locations on the ECRMP website and announced the meetings in the April 2017 ECRMP newsletter. The BLM emailed the newsletter to the project mailing list which includes individuals; federal, state, and local government agencies; Tribal governments; cooperating agencies; interest groups, and other interested parties. At the meetings, the BLM gave a presentation on the *Preliminary Alternatives Report* and the *Draft Basis for Analysis* and the public had the opportunity to review poster boards and speak one-on-one with BLM staff. A total of 136 people attended the meetings (Table 1-1).

**Table 1-1. Public Meeting Attendance**

Meeting Date	Meeting Location	Number of Attendees
April 4, 2017	Denver	21
April 5, 2017	Fairplay	4
April 6, 2017	Salida	43
April 11, 2017	Cañon City	17
April 12, 2017	Colorado Springs	18
April 13, 2017	Walsenburg	27
April 19, 2017	Greeley	6
April 20, 2017	Leadville	0
<b>Total</b>		<b>136</b>

The BLM received 368 unique comment documents, including one petition with 1,231 signatures, and 1,162 form letters during the public review period (see section 2.3, Data Capture, for the ways in which comments were submitted).

The remainder of this report is organized as follows:

- **Section 2.0: How Comments Were Analyzed** – Describes how the BLM received, recorded, and categorized comment letters and individual comments.

- **Section 3.0: Comment Analysis** – Describes commenters’ organizational affiliation, the number of comments received by issue category, and summarizes comments received.
- **Appendix A: MetroQuest Screens** – Shows screen shots of the MetroQuest online collaboration tool.

## **2.0. HOW COMMENTS WERE ANALYZED**

The BLM used a systematic process to compile, categorize, and consider all written public comments on the *Preliminary Alternatives Report* and the *Draft Basis for Analysis* to identify substantive issues for consideration by BLM-decision makers, as directed by National Environmental Policy Act (NEPA) regulations. The comment analysis was a way for the BLM to consider the substantive issues raised in comments and, if appropriate, revise the alternatives and the *Basis for Analysis* in response to these issues.

All written comments received or postmarked during the public review period were considered by the BLM in the comment analysis. For the purposes of this document, the entire written submission from a commenter is referred to as a “comment letter” or “submission,” and may refer to hardcopy comments received at the public meetings as well as those submitted by email, the ePlanning website, the MetroQuest online collaboration tool, mail, or fax. Each substantive issue statement on a single topic included in a submission is referred to as a “comment.” One submission might include multiple comments. “Commenter” refers to the individual or organization that submitted the comment letter.

### **2.1. Comment Letters**

Upon receipt of a comment letter, the comment analysis team logged the letter into a comment tracking spreadsheet, assigned a unique identification number (e.g., ECRMP-10001), and uploaded the letter into the BLM’s comment analysis database, CommentWorks. This allowed the BLM to review, organize, and categorize the letter. Each submission was reviewed to determine whether the comments it contained were substantive or nonsubstantive. Although all comments were reviewed, only substantive comments were carried forward for analysis and consideration in revising the alternatives and the *Basis for Analysis*. The comment analysis team relied on Council on Environmental Quality guidance and the BLM NEPA Handbook (H-1790-1) to determine what a substantive comment is. Substantive comments do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the *Preliminary Alternatives Report* and the *Draft Basis for Analysis*
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions to be used for the environmental analysis
- Present new information that will be relevant to the analysis

- Present reasonable alternatives, other than those identified in the *Preliminary Alternatives Report*, that meet the purpose and need of the ECRMP and address significant uses
- Cause changes or revisions in one or more of the alternatives

Comments not considered substantive include the following:

- Comments simply stating opposition or support for alternatives that do not meet the substantive comment criteria listed above
- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the substantive criteria listed above
- Comments that do not pertain to the planning area or scope of the resource management plan (RMP) and environmental impact statement (EIS)
- Comments that take the form of vague, open-ended questions

Substantive comments from each submission were coded to appropriate issue categories. The issue categories generally follow the sections presented in the *Preliminary Alternatives Report* and the *Draft Basis for Analysis*, although some relate to the planning process or editorial concerns. Table 3-2 identifies the issue categories used in the comment analysis.

After the substantive comments were grouped by category, the comment analysis team drafted statements summarizing the comments by issue category, which the BLM considered when making changes to the alternatives and the *Basis for Analysis*.

During the process of identifying comments and concerns, the BLM treated all comments equally. The BLM did not give greater emphasis to comments based on organizational affiliation or status of commenters, and the number of duplicate comments did not increase the priority or merit of one comment over another. Comments were not counted as “votes” for or against the preliminary alternatives or analytical methods; rather, the BLM considered the content of a comment, and whether or not to revise the alternatives or the analytical methods on the basis of that comment.

## **2.2. Form Letters**

Some organizations and/or groups develop form letters that their members can submit to support their organization’s position. Organizations typically provide individual commenters the opportunity to submit the standard letter or modify the letter to add new information. To analyze form letters, the BLM assigned a unique identification number to one copy of each organization’s form letter and uploaded it to the comment analysis database for review. Modified form letters were given their own identification number, and any unique, substantive text within them was categorized and carried forward in the analysis.

## **2.3. Data Capture**

### **2.3.1 ePlanning**

Commenters could submit comments via the ECRMP ePlanning project website: <http://on.doi.gov/1HVULcA>. In the Documents and Reports page on this website, commenters could enter their comment directly, which was then transferred electronically to CommentWorks for analysis.

### **2.3.2 MetroQuest**

Commenters could also submit comments via the ECRMP MetroQuest website, an online interactive collaboration tool developed for the purpose of soliciting public input on the preliminary alternatives. During the public review period, the website was available at <https://ecrmp.metroquest.com/>. On this website, commenters could compare selected components of the alternatives and respond to specific questions on how the BLM should manage various resources. Section 3.5 of this document summarizes participation and public input received through MetroQuest. The following is an overview of the MetroQuest website.

The ECRMP MetroQuest website consisted of a *Welcome* screen followed by four interactive screens (i.e., *Alternatives – Preliminary Alternatives*, *Opportunities – Map Your Ideas*, *Mitigation – Rank Your Priorities*, and *Stay Involved – Thank You For Your Input*) which visitors were guided through in sequence. Attachment A shows screenshots of each MetroQuest screen.

The *Welcome* screen introduced visitors to the website and provided basic information about the ECRMP. Visitors could view a map showing the location of the ECRMP planning area in Colorado.

The *Alternatives* screen showed maps comparing the alternatives for five selected planning issues: recreation, areas of critical environmental concern (ACECs), oil and gas leasing, backcountry conservation areas, lands with wilderness characteristics, and the South Park Master Leasing Plan (MLP). Visitors were instructed to review the alternative themes on the ECRMP website prior to answering the questions. For each alternative, visitors could agree or disagree in response to the question, “Is the management consistent with the alternative theme?” This question was intended to find out whether the visitor thought the content of each alternative was an accurate expression of its theme rather than the visitor’s preference for or against an alternative. The *Alternatives* screen also allowed visitors to insert their own comments on the alternatives for each of the five selected planning issues.

The *Opportunities* screen enabled visitors to place markers on a map of the planning area to identify land use or conservation opportunity areas on BLM-administered surface lands or mineral estate. Visitors could select from predefined map markers for conservation, recreation, renewable energy, land tenure, mineral development, or other. The “other” map marker allowed visitors to define their own marker type. After placing each map marker, visitors could provide

additional information about the marker by selecting from two drop-down menus and submitting their own comments; for example, for the mineral development marker, visitors could indicate whether mineral development should be allowed, allowed with restrictions, or not allowed. For the renewable energy marker, visitors could indicate whether the area should be for wind or solar energy development.

The *Mitigation* screen asked visitors to rank the top five resources the BLM should prioritize for mitigation. Visitors could choose from eight selected resources (landscape mitigation, public access, recreation, special status species, vegetation, water resources, wildfire, and wildlife) or suggest one of their own.

The *Stay Involved* screen asked visitors to respond to several optional questions about the range of alternatives and completeness of the preliminary alternatives, and gave them an opportunity to join the project email list.

### 2.3.3 Other Methods

The BLM also received comment letters via mail, fax, email, and in-person during the public meetings. Self-addressed comment forms were handed out to each attendee, who had the opportunity to submit written comments at each meeting or submit their comments at a later date.

## 3.0. COMMENT ANALYSIS

### 3.1. Comments by the Numbers

The BLM received a total of 368 individual comment letters, including one petition with 1,231 signatures. Two comments were received via ePlanning, 344 were received by email, 13 were received by mail, 7 were received at the public meetings, and 2 were received via fax. Six different form letters were received totaling 1,162 copies (Table 3-1). A total of 806 substantive comments were identified in the comment letters.

**Table 3-1. Form Letters Received**

Form Letter Number	Form Letter Focus	Number of Form Letters Received
Form Letter 1	Prioritize conservation in the new resource management plan	219
Form Letter 2	Sportsmen expect responsible management of BLM lands	141
Form Letter 3	Prioritize conservation in the new resource management plan 2	154
Form Letter 4	Protect wild places in Eastern Colorado	522
Form Letter 5	Protect wildlife with the resource management plan	117
Form Letter 6	Prioritize recreation and conservation in the resource management plan	9
<b>Total</b>		<b>1,162</b>

## 3.2. Comments by Issue Category

The 806 individual substantive comments identified by the BLM during the comment analysis covered a broad range of issues (Table 3-2). The greatest number of substantive comments were associated with recreation (112 comments), lands with wilderness characteristics (77 comments), and mineral resources (67 comments).

**Table 3-2. Number of Substantive Comments per Issue Category**

Issue Category Number	Issue Category	Number of Comments
1.	Preliminary Alternatives Report	0
1.1.	Introduction	0
1.2.	How the Alternatives Were Developed	2
1.3.	Alternatives Considered but Not Analyzed in Detail	0
1.4.	General Description of Each Alternative	0
1.4.1.	Alternative A: The No Action Alternative	1
1.4.2.	Alternative B: Emphasis on Natural Process	0
1.4.3.	Alternative C: Emphasis on Responding to Demand for Resource Use	8
1.4.4.	Alternative D: The Human Ecoregion	6
1.5.	Comparison of Alternatives – Resources	0
1.5.1.	Air Quality and Climate	43
1.5.2.	Soil Resources	7
1.5.3.	Water Resources	18
1.5.4.	Terrestrial Wildlife	21
1.5.5.	Aquatic Wildlife	7
1.5.6.	Vegetation	8
1.5.7.	Wetlands and Riparian Resources	1
1.5.8.	Special Status Species	22
1.5.9.	Wildland Fire and Fuel Management	2
1.5.10.	Cultural Resources	6
1.5.11.	Tribal Concerns	0
1.5.12.	Paleontological Resources	1
1.5.13.	Visual Resources	5
1.5.14.	Lands with Wilderness Characteristics	79
1.6.	Comparison of Alternatives – Resource Uses	0
1.6.1.	Recreation	112
1.6.2.	Livestock Grazing	45
1.6.3.	Forestry	4
1.6.4.	Mineral Resources	67
1.6.5.	Renewable Energy	25

<b>Issue Category Number</b>	<b>Issue Category</b>	<b>Number of Comments</b>
1.6.6.	Travel and Transportation Management	10
1.6.7.	Lands and Realty	15
1.6.8.	South Park Master Leasing Plan	43
1.7.	Comparison of Alternatives – Special Designations	5
1.7.1.	Areas of Critical Environmental Concern	26
1.7.2.	Backcountry Conservation Areas	20
1.7.3.	National and State Scenic Byways	1
1.7.4.	Wild and Scenic Rivers	15
1.7.5.	Wilderness Areas and Wilderness Study Areas	3
1.8.	Comparison of Alternatives – Social and Economic Conditions	0
1.8.1.	Public Health and Safety	5
1.8.2.	Social and Economic Values	4
1.9.	References	1
1.10.	Appendix A – Glossary	0
1.11.	Appendix B – Eastern Colorado Mitigation Strategy	0
1.12.	Appendix C – Adaptive Drought Management	0
1.13.	Appendix D – Lands with Wilderness Characteristics Maps	0
1.14.	Appendix E – Recreation and Visitor Services Management	0
1.15.	Appendix F – BLM Standards for Public Land Health and Guidelines for Livestock Grazing Management in Colorado	0
1.16.	Appendix G – Mineral Resources Maps	1
1.17.	Appendix H – Coal Screening Criteria in the Royal Gorge Field Office	0
1.18.	Appendix I – Renewable Energy Maps	0
1.19.	Appendix J – Lands and Realty Maps	0
1.20.	Appendix K – South Park Master Leasing Plan Maps	0
1.21.	Appendix L – Backcountry Conservation Areas	0
1.22.	Appendix M – Special Designations Maps	0
2.	Draft Basis for Analysis	0
2.1.	Overview	0
2.2.	Analysis Procedures Common to Multiple Resources	0
2.2.1.	Scale of Analysis	0
2.2.2.	Type and Duration of Impacts	0
2.2.3.	Geographic Information System	0
2.2.4.	Use of Assumptions and Indicators	0
2.2.5.	Focus on Key Impacts	0
2.2.6.	Surface Disturbance	2
2.3.	Resource-Specific Analysis Procedures – Resources	0

## Comment Analysis

Issue Category Number	Issue Category	Number of Comments
2.3.1.	Air Quality and Climate	10
2.3.2.	Soil Resources	0
2.3.3.	Water Resources	0
2.3.4.	Terrestrial Wildlife	0
2.3.5.	Aquatic Wildlife	0
2.3.6.	Vegetation	0
2.3.7.	Wetlands and Riparian Resources	0
2.3.8.	Special Status Species	0
2.3.9.	Wildland Fire and Fuel Management	0
2.3.10.	Cultural Resources	0
2.3.11.	Tribal Concerns	0
2.3.12.	Paleontological Resources	0
2.3.13.	Visual Resources	0
2.3.14.	Lands with Wilderness Characteristics	1
2.3.15.	Backcountry Conservation Areas	0
2.4.	Resource-Specific Analysis Procedures – Resource Uses	0
2.4.1.	Recreation	0
2.4.2.	Livestock Grazing	0
2.4.3.	Forestry	0
2.4.4.	Fluid Minerals	8
2.4.5.	Solid Minerals	1
2.4.6.	Coal	0
2.4.7.	Renewable Energy	3
2.4.8.	Travel and Transportation Management	0
2.4.9.	Lands and Realty	0
2.4.10	South Park Master Leasing Plan	0
2.5.	Resource-Specific Analysis Procedures – Special Designations	0
2.5.1.	Areas of Critical Environmental Concern	0
2.5.2.	National and State Scenic Byways	0
2.5.3.	Wild and Scenic Rivers	1
2.5.4.	Wilderness Areas and Wilderness Study Areas	0
2.6.	Resource-Specific Analysis Procedures – Social and Economic Conditions	0
2.6.1.	Public Health and Safety	0
2.6.2.	Social and Economic Values	3
2.7.	References	0
3.	Range of Alternatives	25
4.	Laws, Regulations, Guidance, Process	0

Issue Category Number	Issue Category	Number of Comments
4.1.	FLPMA	8
4.2.	Cooperating Agencies	0
4.3.	Consultation and Coordination	12
4.4.	Consistency with Other State, County, or Local Plans	3
4.5.	Other Laws	7
5.	NEPA	0
5.1.	Purpose and Need	1
5.2.	Planning Area/Decision Area	2
6.	Indirect and Cumulative Impacts	0
7.	Mitigation	15
7.1.	Landscape Level Mitigation	0
8.	Stipulations	0
9.	Best Management Practices	5
10.	GIS Data and Mapping	0
11.	Editing: Grammar, Punctuation, Spelling, Readability	60
12.	Out of Scope	0
<b>Total</b>		<b>806</b>

Note: Duplicative comments submitted in form letters were counted as one comment.

### 3.3. Submission Affiliations

The BLM received comments from individuals, businesses, interest groups, and Federal, State, and local government agencies (Table 3-3).

**Table 3-3. Comment Letters by Affiliation**

Commenter Affiliation	Number of Comment Letters
Individual	315
Business	15
Interest Group	29
Federal Agency	1
State Agency	3
Local Agency	5
<b>Total</b>	<b>368</b>

### **3.4. Comment Summaries**

This section summarizes the substantive comments the BLM received. The subsections below are organized by primary issue categories and then by subtopics, similarly to the *Preliminary Alternatives Report* and the *Draft Basis for Analysis*, as well as by additional categories the BLM identified. Only those issue categories for which substantive comments were received are listed below. A full list of issue categories is shown in Table 3-2.

#### **Issue Category 1. Preliminary Alternatives Report**

##### ***1.2. How the Alternatives Were Developed***

- The BLM should consider all public input and not rely only on local public opinion when developing the alternatives.
- Commenters questioned why the four ecoregions under Alternative D have different goals, objectives, and uses.

##### ***1.4. General Description of Each Alternative***

###### **1.4.1. Alternative A: The No Action Alternative**

- Commenters requested an explanation of deficiencies in the existing RMPs and why they cannot be addressed with an RMP amendment.

###### **1.4.3. Alternative C: Emphasis on Responding to Demand for Resource Use**

- Some commenters expressed concern that Alternative C would allow too much development of public lands.
- Commenters stated that this alternative was not given adequate consideration in the report.

###### **1.4.4. Alternative D: The Human Ecoregion**

- Some commenters stated that local input should be given greater weight in determining management for parcels near where they live than comments from communities located further away.
- One commenter suggested using the Environmental Protection Agency's ecoregions to divide the planning area into individual regions.
- Commenters suggested that Alternative D does not contain adequate measures for resource conservation.
- Commenters expressed concern with Alternative D's theme (i.e., allowing for local community use and interest based on people's desires) and recommended that management decisions not be based on "the loudest

voice in the room," but by considering the use and resource value of the land.

- Commenters noted that it is challenging to compare the other alternatives to Alternative D because they are not geographically divided in the same way. They suggested the BLM develop a modified approach to allow for specialized management decisions based on geographic zones where applicable across all of the alternatives.

## ***1.5. Comparison of Alternatives – Resources***

### ***1.5.1. Air Quality and Climate***

#### ***Air Quality***

- Commenters were concerned that BLM was exceeding its authority for managing air quality, especially in Alternative D.
- Commenters recommended that the BLM place additional stipulations on activities that contribute to air pollution, such as waste gas emissions, and asked that the BLM maintain conformance with the Colorado State Implementation Plan.
- Commenters stated the BLM could not claim exemption from the General Conformity rule.
- Commenters requested robust analysis of the effects of oil and gas development and operation on air quality.
- Commenters indicated the BLM must analyze and mitigate fugitive dust emissions.
- Commenters recommended the BLM coordinate their air quality monitoring efforts with the Colorado Department of Public Health and Environment and Environmental Protection Agency and make the data publicly available.
- Commenters suggested including Air Quality and Climate Alternative D Management Action 5 under Alternative B.
- Commenters suggested including Air Quality and Climate Alternative D Management Action 5 under Alternative C.

#### ***Climate***

- Commenters were concerned that climate change was not fully addressed and considered in the *Preliminary Alternatives Report* and made several suggestions regarding methods of analysis, management, and relevant reference documents for the ECRMP.

- Commenters noted that the emissions requirements the BLM proposed in some of the alternatives did not align with the Trump administration's climate change policy.
- Commenters had concern for climate change and requested including a robust analysis of greenhouse gas emissions, management actions to mitigate climate change impacts, and establishing adaptation measures.

**1.5.2. Soil Resources**

- Commenters expressed that all alternatives should aim to improve soil conditions and contain measures for reclamation.

**1.5.3. Water Resources**

- Commenters expressed the desire for particular areas to be managed with additional protection measures including Badger Creek and all Gold Medal Waters, and suggested specific management actions and best management practices to maintain water quality.
- Commenters noted that the alternatives should include measures to protect water resources during periods of drought.
- Commenters stated that the BLM was exceeding its authority in its objective to maintain groundwater quality at higher standards than required by the State of Colorado.
- Commenters expressed concern over the number of flammable and combustible liquids, corrosives, oxidizers, and other pollutants with the potential to impact water quality being transported by highway and rail to support metal mining operations.

**1.5.4. Terrestrial Wildlife**

- Commenters noted the need for development and maintenance of contiguous wildlife habitat areas.
- Commenters suggested no surface occupancy (NSO) stipulations for crucial winter ranges.
- Commenters suggested controlled surface use (CSU) and well spacing limitations in areas containing habitats with high value to big game.
- Commenters suggested the BLM consider an NSO stipulation on the James Mark Jones State Wildlife Area in light of the Colorado State Lands Board's approved 10-year NSO.
- Commenters supported Alternative B protection measures for wildlife and wildlife habitats. They identified specific areas to prioritize for protection,

including lands along the Arkansas River Canyonlands, Echo Canyon, and Table Mountain.

- Commenters requested the BLM analyze the impacts to summer range for elk in addition to winter ranges.
- Commenters related that more up-to-date data are available regarding big game populations and requested the BLM use 2015 data in the ECRMP.
- Commenters suggested the BLM identify how and when wildlife habitat treatments have met desired conditions (e.g., on a project-by-project basis, within 10 years).
- Commenters suggested the RMP reflect the BLM's focus on managing forestry for landscape heterogeneity and long-term forest health, which in turn would have beneficial impacts on migratory bird populations.

#### **1.5.5. Aquatic Wildlife**

- Commenters suggested additional goals be developed to prioritize the preservation and enhancement of fisheries.
- Commenters suggested adding a goal to create opportunities to increase the resilience of riparian areas, native trout populations, and aquatic species through habitat improvement projects.
- Commenters were concerned that the BLM did not recognize the importance of or propose adequate management for substantial fisheries that exist in the planning area.
- Commenters requested the ECRMP include analysis of BLM's management obligations for native fish conservation and habitat protection.

#### **1.5.6. Vegetation**

- Commenters noted that Arkansas Canyon stickleaf and jeweled blazingstar should be identified and afforded specific protections in the alternatives.
- Commenters recommended that the ECRMP incorporate information on species of concern from the U.S. Department of Agriculture's Species Conservation Project.
- Commenters were concerned about the removal of pinyon and juniper woodlands across the alternatives.
- Commenters suggested analyzing the effects of drought on vegetation in the ECRMP.

**1.5.7. Wetlands and Riparian Areas**

- Commenters provided additional information sources including the Colorado Wetland Inventory Mapping Tool.

**1.5.8. Special Status Species**

- Commenters suggested adding a goal to protect the drainages that contain or are suitable for cutthroat trout.
- Commenters recommended specific species such as desert massasauga, Gunnison prairie dog, plains sharp-tailed grouse, greenback cutthroat trout, and Colorado River cutthroat trout be included as special status species.
- Commenters suggested reviewing the Greenback Cutthroat Trout Recovery Team and U.S. Fish and Wildlife Service's analysis for the greenback cutthroat trout.
- Commenters requested the 300-foot NSO stipulation for avoidance of all surface-disturbing activities around specific special status species habitat areas, including prairie dog communities and Preble's meadow jumping mouse, be expanded to 1,000 feet.
- Commenters recommended increasing raptor nest timing, surface occupancy, and use stipulations.
- Commenters requested requiring a biological inventory prior to fluid mineral development under all alternatives.
- Commenters noted that conservation measures should allow for site-specific flexibility for fluid minerals development and that the BLM cannot entirely prohibit development within special status species habitat.
- Commenters suggested the BLM develop joint management plans with adjacent land managers.
- Commenters generally expressed the desire for maintaining special status species populations and expanding suitable habitats in the planning area.
- Commenters suggested adding USFWS-listed avian species and Colorado Parks and Wildlife's State Wildlife Action Plan avian species to Terrestrial Wildlife Resource Goal 1.
- Commenters suggested including a hyperlink in the document to the BLM's current list of special status species.

**1.5.9. Wildland Fire and Fuel Management**

- Commenters expressed concern over the potential for methane leaking from oil and gas infrastructure to increase the risk of forest and range fires.

- Commenters suggested that all alternatives emphasize improvement and rehabilitation of vegetation impacted by wildland fires.

**1.5.10. Cultural Resources**

- Commenters asked for more stringent cultural resource management including increasing buffer zones.
- Commenters noted that cumulative effects to the integrity of historic properties must be considered in resource management and development.
- Commenters suggested focusing on proactive archaeological surveys to support efficient Section 106 reviews in areas of planned mineral leasing.
- Commenters suggested the BLM develop a regional model for managing historic properties by ecoregion.

**1.5.12. Paleontological Resources**

- Commenters suggested that the BLM should emphasize preserving paleontological resources across all of the alternatives.

**1.5.13. Visual Resources**

- Commenters noted that the BLM fails to distinguish between short-term and long-term visual impacts.
- Commenters suggested prohibiting rights-of-way in Class I areas.
- Commenters advised considering proximity to lands with conservation easements while determining visual resource management classes for BLM lands.

**1.5.14. Lands with Wilderness Characteristics**

- Commenters suggested new designations or continuing existing designations for lands with wilderness characteristics as follows:
  - Echo Canyon, North and South Badger Creek, Eightmile Mountain, Bear Mountain, Copper Mountain, Stanley Creek, Red Canyon, Sheep Canyon, Table Gulch, Sand Gulch, Falls Gulch Mountain, West Table Mountain, Cucharas Canyon, Reinecker Ridge, Booger Red, Thirty-one Mile Mountain, parcels adjacent to Grape Creek, Cooper Mountain, Thompson Mountain, Gribble Mountain, Twin Mountain, Bighorn Sheep Canyon, North Coaldale/Cotopaxi, McIntyre Hills, Beaver Creek, and Jack Hall Mountain.
- Commenters expressed the desire to protect lands with wilderness characteristics from development but allow nonmotorized recreation.

Commenters also requested clarification on whether over-snow travel qualifies as a mechanized use.

- A number of commenters explicitly stated that fluid mineral development should not be allowed in lands with wilderness characteristics.
- Commenters suggested that in areas where lands with wilderness characteristics overlap with backcountry conservation areas, both planning designations should be maintained or enhanced.
- Some commenters recommended using a three-tier system to categorize lands with wilderness characteristics: (1) very high quality, strongest protections; (2) additional lands managed primarily for wilderness characteristics; (3) remaining lands managed for multiple use other than wilderness.
- Commenters were concerned that designating some areas as lands with wilderness characteristics could restrict livestock grazing.
- Commenters recommended the BLM manage lands to maintain wilderness characteristics in each action alternative and include more areas in the Human Ecoregion alternative.
- Commenters suggested establishing mitigation requirements for potential impacts to lands with wilderness characteristics, provisions for temporary withdrawals, and a process to reinstate the lands after impacts have been mitigated.

## ***1.6. Comparison of Alternatives – Resource Uses***

### ***1.6.1. Recreation***

- Some commenters expressed their desire to keep public lands open to recreational target shooting, while other commenters supported the closure of public lands to target shooting.
- Commenters suggested addressing other types of recreation in the alternatives, such as gold prospecting and recreational gem and mineral collection.
- Commenters requested that recreational drone use, shed hunting, and nonmotorized bicycling be analyzed in the ECRMP for impacts on sensitive wildlife and habitats.
- Commenters requested clarification regarding extensive recreation management areas (ERMAs) versus special recreation management areas and put forth specific areas to be considered for ERMAs, including Stanley Creek and Thompson to Campton Mountain.

- Commenters expressed concern that they did not understand the management for the Fourmile Area under any of the alternatives.
- Some commenters generally supported an increase in recreational restrictions, particularly motorized recreation and hunting, and others generally opposed restrictions.
- Commenters suggested the BLM could charge a fee to recreational users to offset BLM costs.

**1.6.2. Livestock Grazing**

- Commenters noted the benefits of livestock grazing, including grazing of low fast-burning grasses, which reduces the risk of wildfire, and fostering the regeneration of soils and native vegetation.
- Commenters brought up numerous concerns regarding the closure of areas to livestock grazing including economic impacts on local ranches and communities, the BLM's need to meet the multiple-use mandate, blocked access to private grazing areas, and wildlife movement barriers due to fencing.
- Commenters requested that discussions of the impacts of livestock grazing be more data-derived and that the BLM use a valid monitoring protocol to substantiate the determination of proper and improper grazing.
- Commenters were concerned that land health assessments were the only data being used to determine the ecological function of lands allotted for livestock grazing and requested the BLM also use ecological site soil and hydrological data.
- Commenters noted that the document does not identify major concerns regarding existing grazing practices and, therefore, questioned the rationale for proposing to manage large portions of the planning area as unavailable for livestock grazing.
- Commenters suggested sheep and goat grazing be evaluated on a case-by-case basis instead of categorically prohibited or curtailed.
- Commenters noted some of the environmental impacts caused by cattle grazing may include damage to riparian areas and streams.
- Commenters noted that none of the alternatives proposed increasing lands available to livestock grazing compared to current conditions.

**1.6.3. Forestry**

- Commenters suggested stipulations for timber harvesting and right-of-way development.

- Commenters asked for the BLM to eliminate certain stipulations to reduce costs.

#### **1.6.4. Mineral Resources**

##### **No Energy Development**

- Commenters expressed their opposition to energy development on public lands and suggested closing all BLM lands to mineral extraction, oil and gas leasing, and coal mining.
- Commenters suggested prohibiting hydraulic fracturing on public lands.
- Commenters raised concerns about the effects of mineral development on water quality, air quality, public access, and wildlife.

##### **Specific Areas to Close/Restrict Oil and Gas Development**

- Commenters suggested closing the following areas to energy development (oil and gas, mining):
  - Lands with wilderness characteristics, Badger Creek (north and south), Sands Gulch near Cotopaxi, Table Mountain, area near Shelf Road in CC, Reinecker Ridge, Echo Canyon, Mt Mestas, Bear Mountain, Eightmile Mountain, Gribble, Twin Mountains, Upper Red Canyon, riparian areas, old growth forests, rare species habitat, steep slopes and any slopes with erosion or landslide prone soils.
- Commenters suggested not reissuing oil and gas leases when they end on Federal units in Huerfano County.
- Commenters suggested prohibiting oil and gas development near State parks, wildlife refuges, and State wildlife areas.
- Commenters suggested not granting any waivers, exceptions, or modifications to fluid mineral leasing stipulations.
- Commenters noted that all watersheds should be prioritized for protection from the impacts of mineral extraction.

##### **General Constraints**

- Commenters suggested that all mineral leases should be under the strictest allowances.
- Commenters wanted strong stipulations applied to all leases to reduce impacts.
- Commenters suggested requiring master development plans for all oil and gas activities.
- Commenters asked for clarification on the process and criteria for applying waivers, exceptions, and modifications to lease stipulations.

*Concern with Range of Fluid Mineral Alternatives*

- Commenters stated that the range of alternatives for managing fluid minerals was inadequate. Commenters indicated the acreage open to leasing in the preliminary alternatives “ranges” from 96 percent of the decision area open in Alternative B to 99.7 percent open in Alternative C.
- Commenters suggested the following two alternatives:
  - Close all BLM surface ownership to oil and gas leasing, which would still leave 76% of the decision area available to oil and gas leasing.
  - Close the decision area to oil and gas leasing.
- Commenters recommended that BLM should consider significant closures to oil and gas development, including lands along the Arkansas River.
- Commenters requested that the BLM conduct a full assessment of direct and indirect impacts of unconventional oil and gas activities on wildlife and ecosystems.
- Commenters suggested the BLM consider a phased leasing approach throughout the field office.

*Support for Fluid Mineral Leasing*

- Commenters indicated mineral, renewable, and nonrenewable energy resources need to be managed to promote sustainable development and meet market demand.
- Commenters suggested all areas should be open to the most use as possible.
- Commenters were concerned that closure of fluid mineral leasing would be in conflict with the current presidential administration’s policies.
- Commenters noted that the BLM must ensure that cultural and tribal provisions do not restrict valid existing oil and gas lease rights.

*Safety Concerns*

- Commenters asked the BLM to ban all gas flaring on BLM lands except in emergency situations.
- Commenters recommended no surface discharge of produced water.
- Commenters had specific concerns with fluid minerals allowable uses 3 and 5 as well as the need to comply with 500-foot setbacks for waterbodies, waterways, and dwellings.
- Commenters had concern for contamination of groundwater from drilling and hydraulic fracturing.

- Commenters had concern for leakage of methane and other flammable gases during hydraulic fracturing.

**1.6.5. Renewable Energy**

- Commenters were generally in support of establishing a framework for transitioning to a greater dependence on renewable energy while still protecting sensitive resources via exclusion areas.
- Commenters emphasized the need for local government and community collaboration on renewable energy development, particularly due to the mixed ownership patterns across the planning area.
- Commenters provided additional references regarding renewable energy regulations, policies, and tools.
- For better readability, commenters asked the BLM to list all special designations and resources excluded from solar and wind energy development under each alternative.
- Commenters asked the BLM for clarity regarding priority areas and designated leasing areas and made suggestions for identifying and managing them.
- Commenters asked for specificity regarding exclusion areas and made recommendations for expanding them.
- Commenters indicated the BLM should consistently identify the acreage of open, exclusion, and avoidance areas for renewable energy development across the alternatives.
- Commenters requested clarification on whether Alternative D (renewable energy allowable use 2) includes backcountry conservation areas.
- Commenters suggested consistently defining the size of renewable energy projects (i.e., utility-scale versus non-utility-scale) for both wind and solar energy projects (e.g., non-utility scale projects are less than 20 megawatts and utility-scale projects are 20 megawatts or greater).
- Commenters suggested the BLM use the same robust set of exclusion areas for both utility-scale and non-utility-scale renewable energy development.

**1.6.6. Travel and Transportation Management**

- Commenters requested prohibiting construction of new roads in certain areas, such as Grape Creek.
- Commenters suggested seasonal area limitations on nonmotorized travel.

- Commenters asked for clarification on some of the allowable uses, particularly travel and transportation allowable use 5.
- Commenters related that there was not an adequate range of alternatives for travel and transportation management because none of the alternative propose closures to motorized travel outside of wilderness study areas.
- For travel and transportation management actions 11 to 19, commenters requested clarification of how alternatives B, C, and D would address the issues presented under Alternative A.

#### **1.6.7. Lands and Realty**

- Some commenters opposed the sale or transfer of any public land to private entities, while others argued for the retention of specific lands.
- Commenters suggested that the BLM consider the long term value of the land with respect to wilderness before disposing of public lands.
- Commenters asked for clarity regarding split estate management, specifically with respect to recreational and wildlife access as well as BLM's management limitations.
- Commenters requested that if the BLM decides to sell any leased lands, the lessee should be given an opportunity to bid on that parcel.
- Commenters suggested scaling the scope of decisions for land use allocations to those portions of the field office for which decisions are necessary.
- Commenters suggested varying the width of the West-wide Energy Corridor 87-277 to expand the range of alternatives.

#### **1.6.8. South Park Master Leasing Plan**

- Commenters asked for a more detailed MLP that establishes stipulations, phased leasing, and best management practices, and requirements to prepare master development plans, to allow for responsible development of oil and gas while protecting recreation, wildlife habitat, and water quality.
- Commenters were concerned that the 0.25-mile buffer zone for fluid mineral development in the South Park MLP is too small to protect raptor nesting areas.
- Commenters requested that the BLM develop waste minimization stipulations in the MLP.
- Commenters requested that either all or parts of Reinecker Ridge be closed to fluid mineral leasing.

- Commenters asked that the MLP include a description of all aquifers in the area, map faults, and identify sensitive groundwater resources and their uses.
- Commenters recommended various wildlife and water-related stipulations including setbacks and NSOs.
- Commenters requested that the Sportsmen Backcountry Conservation Areas be included in the MLP.
- Commenters related that a discussion of the reasoning for the allowable uses under each alternative would be beneficial.
- Commenters requested that the BLM expand its range of alternatives regarding noise stipulations in the South Park MLP and suggested the San Rafael Desert MLP as an example.
- Commenters suggested implementing the same standards for mineral extraction outside the South Park MLP boundary as would be implemented within the South Park MLP boundary.

#### ***1.7. Comparison of Alternatives – Special Designations***

- Commenters asked for clarification regarding how management of special designations will meet resource protection needs in the alternatives.
- Commenters suggested making a network of protected areas to connect them to other specially-managed areas in a landscape-level approach.
- Commenters generally supported special designations in the Preferred Alternative.

##### ***1.7.1. Areas of Critical Environmental Concern***

- Commenters suggested specific areas be designated or continue to be designated as ACECs, including:
  - Fourmile, potential conservation areas developed by Colorado State University, Arkansas River Canyon corridor, Garden Park, Phantom Canyon, Reinecker Ridge, Mount Mestas, Grape Creek, Mosquito Pass, Beaver Creek, Cucharas Canyon, Long's Gulch, Dead Goat Gulch, Sweetwater Gulch, Longfellow Gulch, North and South Badger Creek, Sand Gulch/Falls Gulch Mountain, Echo Mountain, Table Mountain, Eightmile Mountain, Thompson Mountain, Gribble Mountain, Twin Mountain, Cooper Mountain, Waugh Mountain, Upper Red Canyon, and Bear Mountain.
- Commenters suggested that if the Garden Park ACEC was closed to recreational shooting, any replacement site should be operational prior to restricting shooting in and around the ACEC.

- Commenters were concerned about the effects of noise from the Dinosaur Flats shooting area on the Garden Fossil Park National Natural Landmark and Garden Park ACEC.
- Commenters noted that the ACEC maps should include land ownership and adjacent or internal areas with special land-use designations.
- Commenters requested clarification of what parts of the planning process address the concerns of the complex geology of the North Raton Basin and Dikes of the Spanish Peaks if they are not designated as ACECs.
- Commenters suggested the BLM provide the opportunity for voluntary inclusion of all or a part of an ACEC within a grazing allotment, mineral lease, or in the case of an ACEC adjacent to private land through a conservation allotment specific to the ACEC, to the landowner or lessee and request an acknowledgement that the holder of the allotment take the steps necessary to assure that their activities do not adversely affect the ACEC.

#### **1.7.2. Backcountry Conservation Areas**

- Commenters requested improvements to front-country access.
- Commenters supported closure and restoration of routes identified for closure in travel management plans.
- Commenters recommended a number of allowable uses and other management components, including limiting motorized and mechanized travel and excluding rights-of-way.
- Commenters proposed specific areas be designated as backcountry conservation areas including:
  - Reinecker Ridge, lands with wilderness characteristics, Cooper Mountain, Echo Canyon, Hindman Gulch, Mosquito Pass, and Granite.
- Commenters recommended the BLM use Washington Office Instruction Memorandum 2017-36 to guide management of backcountry conservation areas with two different use areas in each backcountry conservation area.
- Commenters requested excluding backcountry conservation areas from utility-scale renewable energy development as well as mineral material disposal.
- Commenters emphasized the importance of collaboration with stakeholders, such as hunters and anglers, in the development of backcountry conservation areas.

- Commenters were concerned with maintaining access to existing utilities (i.e., pipelines) in Backcountry Conservation Areas.

**1.7.3. National and State Scenic Byways**

- Commenters expressed opposition to managing national and State scenic byways as proposed under Alternative C.

**1.7.4. Wild and Scenic Rivers**

- Commenters asked for increased discussion and clarity regarding the process of how wild and scenic rivers are established and managed.
- Commenters requested increased specificity in the goals and objectives of wild and scenic rivers regarding eligible, suitable, or congressionally designated rivers.
- Commenters asked for a wider range of alternatives for wild and scenic rivers, such as varying the number of streams managed as eligible under each alternative rather than only under Alternative B.
- Commenters recommended that fluid mineral development be prohibited near eligible wild and scenic rivers.
- Commenters specifically suggested the Arkansas River Segments 1, 2, 3, and 4; Beaver Creek, East Beaver Creek, and West Beaver Creek; Eightmile Creek; Fourmile Creek; Grape Creek Segments 1, 2, and 3; East Gulch; Cottonwood Creek; East Fork Arkansas River; Little High Creek; Pass Creek; and Red Creed for wild and scenic river designation and to retain status for the other 15 eligible segments.

**1.7.5. Wilderness Areas and Wilderness Study Areas**

- Commenters urged the BLM to protect wilderness lands for the long term.
- Commenters suggested prohibiting mechanized travel in wilderness areas and wilderness study areas.

***1.8. Comparison of Alternatives – Social and Economic Conditions***

**1.8.1. Public Health and Safety**

- Commenters favored the BLM assuming responsibility for the minimization and cleanup of dumping or littering on public lands rather than requesting assistance from local communities.
- Commenters noted that the alternatives must address the potential impacts of fluid mineral development on human health and safety.

- Commenters requested that the BLM identify dam security safety risks and limit public access to dams in the planning area.

**1.8.2. Social and Economic Values**

- Commenters suggested that the BLM analyze the impacts of ecosystem services under each alternative, which are defined as the benefits people obtain from the ecosystem including food, water, medicines, and raw materials, among others.

**1.9. References**

- Commenters requested the BLM expand the list of references to include regulations as well as public stakeholder meeting summaries.

**1.16. Appendix G: Mineral Resources Maps**

- Commenters recommended that the release of the draft mineral resources maps be delayed until the BLM Royal Gorge Field Office *Mineral Potential Report* is available for review.

**Issue Category 2. Draft Basis for Analysis**

**2.2. Analysis Procedures Common to Multiple Resources**

**2.2.6. Surface Disturbance**

- Commenters noted that certain activities excluded from the definition of surface-disturbing activities, such as livestock grazing and use of vegetation management tools (i.e., mastication, hand thinning, and feller-bunchers), should be considered surface-disturbing activities if conducted in a concentrated or intensive manner.

**2.3. Resource-specific Analysis Procedures – Resources**

**2.3.1. Air Quality and Climate**

- Commenters noted that the Reasonably Foreseeable Development Report provides a reasonable estimate of future oil and gas development for use in estimating potential emissions impacts, which should be included in the analysis.
- Commenters recommended that BLM quantify climate impacts across all of the alternatives.
- Commenters suggested that BLM improve its analysis of climate impacts at the planning stage to minimize and mitigate climate impacts. Commenters recommended establishing baseline greenhouse gas

emissions inventories and requirements using sources such as the National Oceanic and Atmospheric Administration observatory, Colorado Oil and Gas Conservation Commission, the Greenhouse Gas Protocol, and the Environmental Protection Agency's Greenhouse Gas Reporting Rule.

**2.3.14. Lands with Wilderness Characteristics**

- Commenters requested additional information on the process and criteria used by the BLM to identify lands with wilderness characteristics, particularly for lands where eligibility may be affected by adjacent mining activities.

**2.4. Resource-specific Analysis Procedures – Resource Uses**

**2.4.4. Fluid Minerals**

- Commenters urged the BLM to ensure the adequacy of all assumptions to accurately represent the significance of fluid mineral leasing, including the demand for fluid mineral resources over the life of the plan as well as the limited amount of BLM-managed fluid mineral acreage and production in the planning area.
- Commenters stated that the assumptions and predictions in the Reasonable Foreseeable Development Scenario for Oil and Gas Development that are outdated need to be revised and disclosed prior to conducting the impact analysis.

**2.4.5. Solid Minerals**

- Commenters noted that the BLM Royal Gorge Field Office *Mineral Potential Report* should not be cited in the *Basis for Analysis* as it has not yet been completed or released for public review.

**2.4.7. Renewable Energy**

- Commenters provided relevant regulations, policies, and tools for the BLM to use in the analysis of renewable energy resources.
- Commenters recommended that the BLM include a robust reasonably foreseeable development scenario to inform decisions on renewable energy and transmission.

**2.5. Resource-specific Analysis Procedures – Special Designations**

**2.5.3. Wild and Scenic Rivers**

- Commenters suggested additional data sources and analysis indicators for characterizing the affected environment.

## **2.6. Resource-specific Analysis Procedures – Social and Economic Conditions**

### **2.6.2. Social and Economic Values**

- Commenters noted that there are both economic benefits and costs associated with fluid mineral development that should be thoroughly analyzed in the ECRMP. Commenters provided references to assist in analysis.

### **Issue Category 3. Range of Alternatives**

- Commenters noted that most resource goals and objectives appear to be formulated from Alternative B and, therefore, do not represent an adequate range of alternatives.
- Commenters felt that the alternatives were overly simplified and could be qualified as resource preservation, resource extraction, and public options that do not provide for a fair basis for selection.
- Some commenters proposed both breaking apart and combining elements of different alternatives to create new alternatives and recommended that the Preferred Alternative embody a balance of conservation and consumptive use.
- Commenters recommended including additional human ecoregions under Alternative D, including the Southern Rockies, Huerfano Park, Mount Mestas Gateway, Sangre de Christo Mountains, and Spanish Peaks as the Scenic Huerfano Human Ecoregion; and the Spanish Peaks and Raton Basin dike fields.
- Commenters requested that management for maintaining semi-private nonmotorized recreation areas be expanded beyond Alternative A.

### **Issue Category 4. Laws, Regulations, Guidance, Process**

#### **4.1. Federal Land Policy and Management Act**

- Commenters were concerned that the alternatives do not meet the Federal Land Policy and Management Act's multiple-use mandate.
- Commenters noted that if implementation of the ECRMP does not conform to the Colorado State Implementation Plan, then it is failing to protect air quality standards consistent with the Federal Land Policy and Management Act; therefore, commenters recommended BLM amend or revise the ECRMP to meet these standards.
- Commenters noted that cumulative effects must be analyzed to be in compliance with Federal Land Policy and Management Act and the Endangered Species Act.
- Commenters were concerned that BLM predetermined the outcome of the NEPA analysis by making statements of required allotment use management reductions in the plan, which violates the Federal Land Policy and Management Act.

**4.3. Consultation and Coordination**

- Commenters emphasized the need for collaboration with landowners, stakeholders, local governments and communities, other agencies, and tribes during the planning process.
- Commenters suggested the BLM hold public workshops focused on recreation management planning to provide clarity about recreation planning and solicit public input.
- Commenters noted that comments they submitted during the envisioning and scoping processes were not included in the *Preliminary Alternatives Report* or *Draft Basis for Analysis* and requested an explanation as to why.

**4.4. Consistency with Other State, County, or Local Plans**

- Commenters stated that the BLM must maintain consistency with local plans and initiatives, such as the Lake County Open Space Initiative.

**4.5. Other Laws**

- Commenters noted that the BLM Royal Gorge Field Office's interpretation of the Migratory Bird Treaty Act was not consistent with other BLM field offices, which allow active logging from May 15 through July 15.
- Commenters relayed that BLM must stay in conformance with all Federal resource regulations and laws including the Clean Air Act; the Clean Water Act; and the recent Executive Order 13783, Secretarial Order 2249, and House Joint Resolution 44 rescinding the Obama Administration's guidance on climate change, mitigation, and landscape scale planning.

**Issue Category 5. National Environmental Policy Act**

**5.1. Purpose and Need**

- Commenters recommended that the ECRMP clearly define what needs the existing resource management plans do not meet and why those needs cannot be met through an amendment process in its purpose and need statement.

**5.2. Planning Area/Decision Area**

- Commenters were concerned about the small, discontinuous nature of BLM-administered surface lands, which cover 3 percent of the planning area, when considering cumulative effects.
- Commenters expressed concern that due to the boundaries the BLM delineated for the four landscapes in Alternative D, the vast majority of BLM lands with special designations are in the Upper Arkansas River Valley landscape and recommended that BLM conservation values be evaluated in the context of the entire planning area.

**Issue Category 7. Mitigation**

- Commenters asked for detailed mitigation, monitoring, and minimization measures and requirements in the ECRMP, specifically in a mitigation strategy, and suggested baseline management prescriptions for mitigation.

**Issue Category 9. Best Management Practices**

- Commenters recommended the BLM apply appropriate best management practices to all future fluid mineral leases based on impacted wildlife and habitat.
- Commenters asked for clarification regarding best management practice development and what best management practices are mandatory.

**Issue Category 11. Editing: Grammar, Punctuation, Spelling, Readability**

- Commenters suggested a number of grammar, punctuation, spelling, and readability edits to the documents.

## **3.5. MetroQuest Participation and Input**

### **3.5.1 Participation**

In total, the ECRMP MetroQuest website received 211 visits from 151 unique Internet Protocol (IP) addresses.<sup>1</sup> Input was provided during 67 of the 211 visits—a participation rate of 32 percent. Participants logged 1,064 data points and submitted 56 optional free-form comments. Five of the 67 participants accessed the website using a mobile device.

### **3.5.2 Summary of Public Input**

The following sections summarize public input gathered through the MetroQuest website screens described in section 2.3.2 and shown in Appendix A. Public input provided through the MetroQuest website that was different from input provided through other data capture methods (i.e., ePlanning, email, mail, fax, in-person) is also reflected in the comment summaries in section 3.4 of this report, but was not entered into CommentWorks.

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<sup>1</sup> An IP address is a unique identifier associated with computers or other devices connected to the internet. Multiple visits from one IP address could represent multiple visits from the same individual; however, they could also represent comments from multiple individuals using the same device or network node, such as a wireless router. Similarly, visits from different IP addresses could be from the same individual using a different device or connecting through a different network. For these reasons, this document does not attempt to identify the number of individuals that visited and participated using the MetroQuest tool.

## **Alternatives Screen**

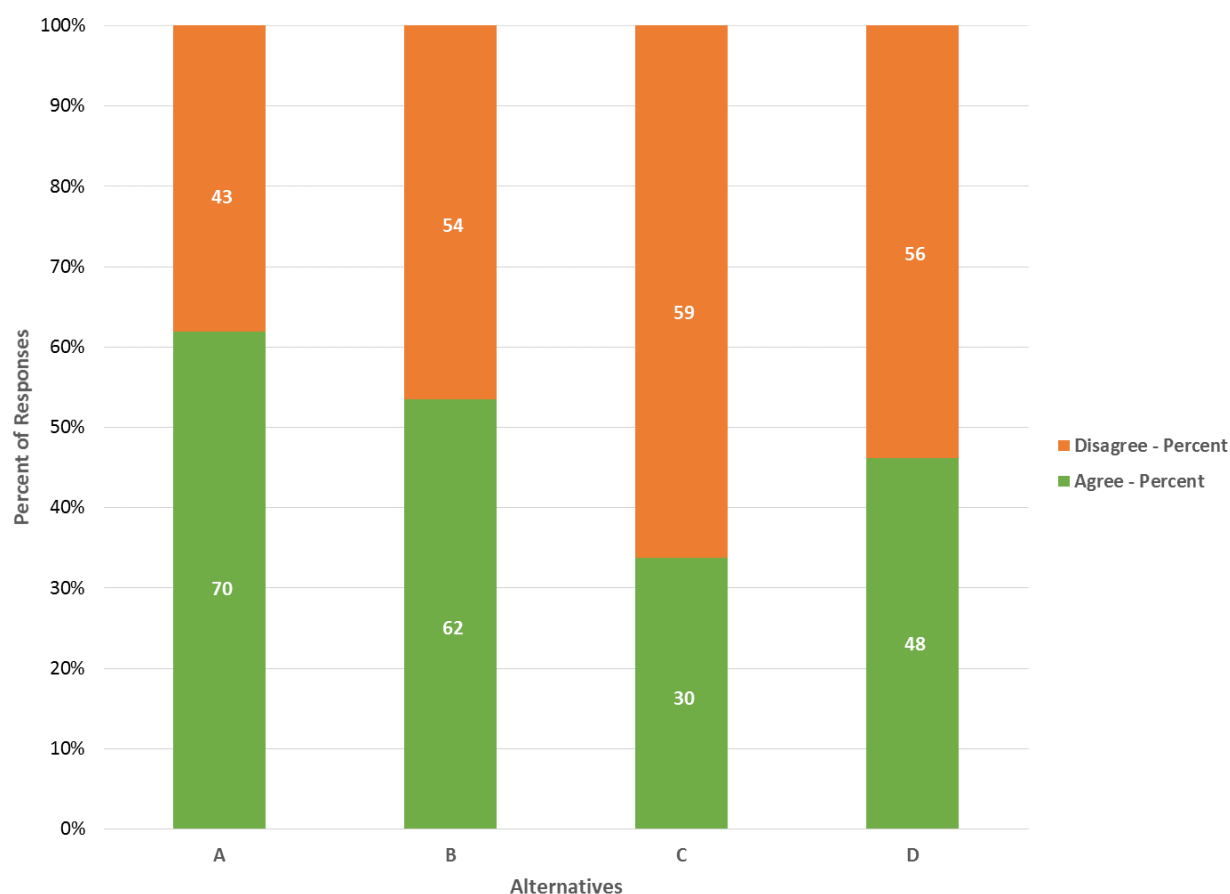
As shown in Figure 3-1, participants rated Alternative A as the alternative that was most consistent with its theme (62 percent), followed in order of decreasing consistency by alternatives B (53 percent), D (46 percent), and C (34 percent) for all planning issue categories combined. Alternative A, the No Action Alternative, is a required component of the NEPA process and carries forward management from the existing RMPs.<sup>2</sup>

Participants rated the alternatives in the same order (A, B, D, and C) for each identified planning issue (i.e., recreation, ACECs, oil and gas leasing, backcountry and wilderness, and the South Park MLP) individually, except: (1) Alternative B management was rated as more consistent with its theme than Alternative A for ACECs and backcountry and wilderness, and (2) Alternative D was rated as more consistent with its theme than Alternative B for oil and gas leasing.

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<sup>2</sup> The two existing RMPs are the 1996 Royal Gorge RMP (BLM. 1996. *Royal Gorge Resource Area Record of Decision and Approved Resource Management Plan*. May 1996. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management) and the 1986 Northeast RMP (BLM. 1986. *Record of Decision for Northeast Resource Management Plan*. September 1986. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management).

**Figure 3-1. Consistency of Management with Alternative Themes**



Source: MetroQuest 2017

Note: White numbers in value bars are numbers of responses.

Most comments on the *Alternatives* screen expressed opinions about expanding, maintaining, or prohibiting specific land uses, such as oil and gas development and recreation. Several participants commented on the range and content of the alternatives. One commenter indicated that goals for Alternatives B, C, and D seemed appropriate, but the means of achieving those goals were not well defined. Commenters made two specific suggestions for Alternative D: (1) consider measures to improve access to recreational and natural areas for the aging population, and (2) provide more nonmotorized trails.

### Opportunities Screen

In total, participants placed 94 map markers on the *Opportunities* screen to identify land use or conservation opportunities of the types shown in Table 3-4.

**Table 3-4. Map Markers by Opportunity Type**

Opportunity Type	Number of Responses
Recreation	42
Conservation	21
Mineral Development	11
Land Tenure	9
Renewable Energy	8
Other	3
<b>Total</b>	<b>94</b>

Source: MetroQuest 2017

Participants that placed map markers for recreation identified new or enhanced opportunities for motorized and nonmotorized recreational uses, primitive backcountry settings, and limited recreation access. The highest concentration of map markers was along the Arkansas River corridor. Specific suggestions provided in comments included the following:

- Maintaining opportunities for hiking in the Echo Canyon, Deer Haven, and McIntyre Hills areas;
- Maintaining opportunities for solitude and primitive forms of recreation in Badger Creek South, the Spanish Peaks, and BLM lands adjacent to the San Isabel National Forest;
- Maximizing areas available for recreational target shooting; and
- Opening a portion of Cache Creek to recreational gold prospecting.

Participants that placed map markers for conservation identified conservation opportunities for water resources, visual resources, special designation areas, wildlife habitat, native species, natural processes, hiking and biking areas, and scenic vistas. Specific areas and resources identified for conservation were Shelf Road, Badger Creek, Bear Mountain/Echo Canyon, endangered bird species habitat at John Martin Reservoir, visual resources of Huerfano Park, migration corridors and habitat connectivity, and pools and springs.

Participants that placed map markers for mineral development suggested specific areas where the BLM should allow or prohibit mineral development. One commenter suggested closing BLM-administered mineral estate in the vicinity of Mt. Mestas to mineral development due to a variety of potential resource conflicts. Another commenter suggested retaining BLM-administered mineral estate in Boulder County and making it available for oil and gas leasing.

Participants that placed map markers for land tenure suggested that the BLM maintain or acquire certain lands and water rights for economic and ecosystem benefits.

Participants that placed map markers for renewable energy suggested certain areas where the BLM should allow wind or solar energy development, or indicated whether development should

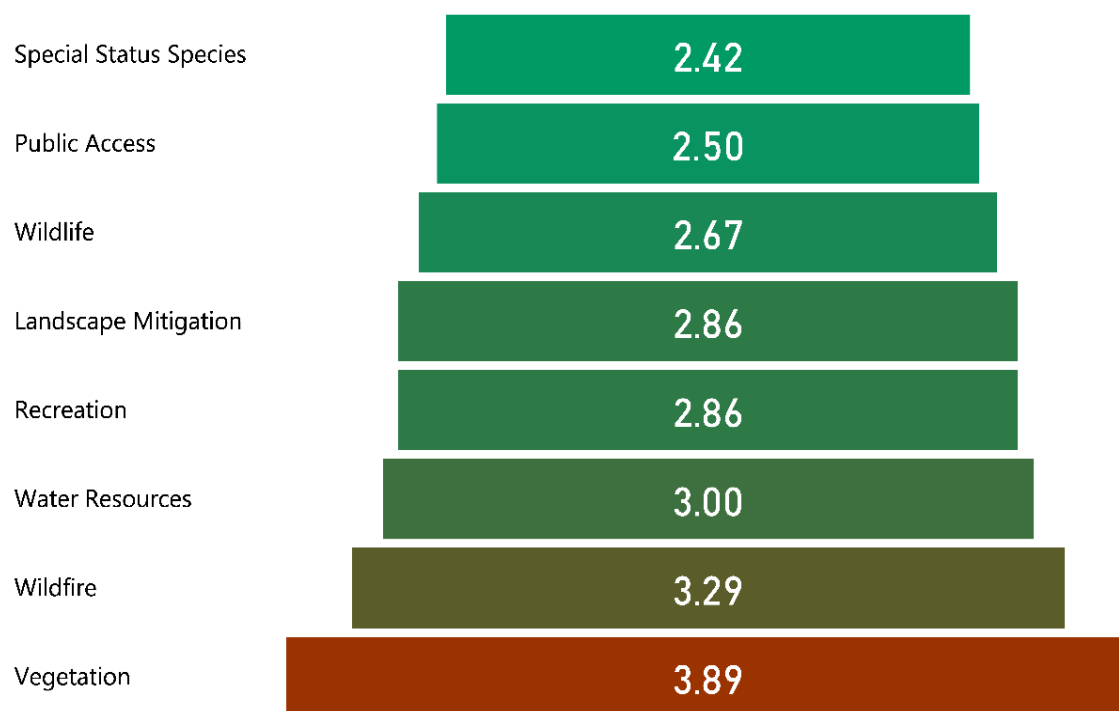
be allowed subject to restrictions. One commenter identified a designated wind farm area in Huerfano County with transmission access.

Map markers labeled as “other” identified areas for recreational shooting or unspecified activities.

### Mitigation Screen

On the *Mitigation* screen, participants ranked their top five mitigation priorities. Figure 3-2 shows the average rank for each resource out of 111 total rankings. The highest ranked resource was special status species, followed by public access, wildlife, landscape mitigation, recreation, water resources, wildfire, and vegetation.

**Figure 3-2. Ranked Mitigation Priorities**



Source: MetroQuest 2017

Note: A lower average rank indicates higher priority for mitigation.

Commenters also made specific suggestions about mitigation in free response comments, such as:

- Determine how climate change will affect the landscape, then limit uses to mitigate the effects.
- Landscape mitigation is most effective when it focuses on protecting larger resource patches and establishing connectivity between them.
- Maintain sufficient instream flow and water quality for aquatic and riparian ecosystems.
- Bring wildfire frequency and intensity back to natural levels.

- Protect native habitats.
- Maintain public access for recreation and provide additional recreational opportunities.

### **Stay Involved Screen**

Table 3-5 shows the questions and responses from 25 total participants. (Note that not all participants responded to each question).

**Table 3-5. Responses to *Stay Involved* Screen Questions**

Type	Yes	No	Not Sure
Is there an adequate range of alternatives?	13	8	4
Important issues that were not addressed?	10	8	6
Join the project email list?	21	2	—

Source: MetroQuest 2017

A majority of participants indicated that there was an adequate range of alternatives. Several participants that indicated the range was inadequate provided comments. One commenter recommended that the BLM propose managing more lands with wilderness characteristics and consider a broader range of ACEC nominations. Another commenter suggested including two sub-alternatives under Alternative D to provide a consistent regional management focus: (1) emphasis on development/mineral extraction, and (2) emphasis on conservation/recreation.

Ten commenters indicated that important issues were not addressed in the preliminary alternatives, while 6 were not sure. Additional issues for consideration identified in comments were establishing recreational gold prospecting areas, providing opportunities for recreational shooting, examining the geology of unstable rock glaciers on La Veta Pass, and considering a proposal to establish a Scenic Huerfano Human Ecoregion.

One commenter asked the BLM to obtain the most up-to-date population objectives and post-hunt population estimates for big game herd management units from Colorado Parks and Wildlife when preparing the ECRMP. Another commenter requested that the BLM maintain existing grazing permits because livestock grazing and ranching can improve rangeland health and preserve open space, are an important source of income for local economies, and are integral to the region's heritage and cultural identity. Other comments expressed personal preferences for or against certain alternatives or land use activities, or raised concerns outside the scope of the ECRMP.

Out of 23 respondents, 21 opted to join the project email list.

# **Appendix A – MetroQuest Screens**

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## APPENDIX A. METROQUEST SCREENS

1

We Want Your Input!

WELCOME


**BLM Eastern Colorado Resource Management Plan**

The Bureau of Land Management (BLM) is planning for the future management of public lands and resources within the Royal Gorge Field Office in eastern Colorado. We want to know what you think about our Preliminary Alternatives for managing recreation, minerals, energy resources, wildlife, and more.

[View Planning Area \(Map\)](#)

[Begin](#)

BLM decisions from this planning process would apply to 658,200 acres of BLM-administered surface land and 3,311,900 acres of BLM-administered mineral estate throughout Eastern Colorado.



2

Preliminary Alternatives

ALTERNATIVES

Recreation

ACECs

Oil and Gas Leasing

Backcountry & Wilderness

South Park MLP

Alternatives for managing recreation areas. [More about this](#)

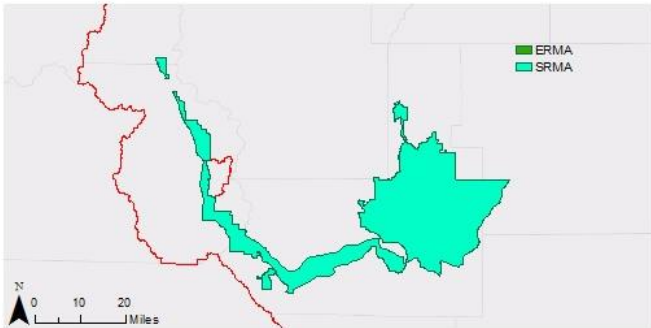
Alternative A

Alternative B

Alternative C

Alternative D

**Alternative A**



Is this management consistent with the alternative theme?

Agree

Disagree

Previous

Optional Comment

Next

3

Map Your Ideas

OPPORTUNITIES

Please drag and drop at least 3 markers on the map.

Renewable Energy

Mineral Development

Recreation

Conservation

Land Tenure

Other

Legend

+

-

Zoom to:

4

Rank Your Priorities

MITIGATION

Order your top 5 items

↑ above this line ↑

Landscape Mitigation

Public Access

Recreation

Special Status Species

Vegetation

Water Resources

Wildfire

Wildlife

Suggest another item

Mitigation strategies are intended to offset impacts from land use activities to achieve healthy and resilient landscapes. Which resources or resource uses should the BLM prioritize for mitigation?

Please drag 5 of the items above the line in your preferred order.

A-2

Eastern Colorado Resource Management Plan  
Preliminary Alternatives and Draft Basis for Analysis Comment Report

5

Thank You For Your Input!

STAY INVOLVED

Final Questions (Optional)

Is there an adequate range of alternatives?  
Select: ▾

Important issues that were not addressed?  
Select: ▾

Optional comments:  
Type...

Join the project email list:  
Select: ▾

Name  
Type...

Email  
Type...

Submit Final Questions

Skip


What's Next?

Your input will be carefully considered as the BLM prepares the Draft RMP/EIS. Please join our mailing list to receive updates about the project.

The Eastern Colorado Resource Management Plan website provides more information on how you can be involved in the process.

Please visit our [website](#).

More info



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