

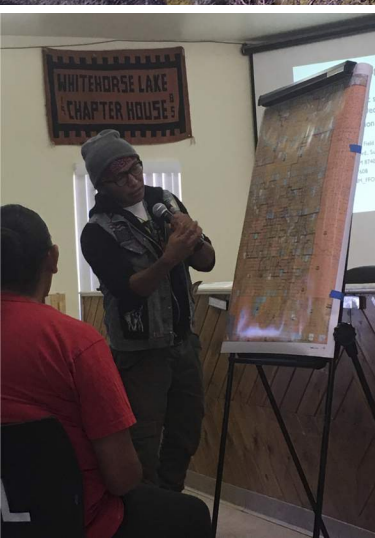


U.S. Department of the Interior
Bureau of Land Management - Farmington Field Office
Bureau of Indian Affairs - Navajo Regional Office

May 2017

Farmington Mancos-Gallup Resource Management Plan Amendment and Environmental Impact Statement

Scoping Report – Volume I



Cooperating Agencies

- 60 federal, tribal, state, and local agencies were invited to join as Cooperating Agencies
- To date, the following agencies have signed memoranda of understanding to become cooperating agencies:
 - National Park Service – Intermountain Region
 - Navajo Nation
 - NH Department of Cultural Affairs, Historic Preservation Division
 - NH Department of Game and Fish
 - San Juan National Forest and Carson National Forest

BIA's Mission:

The Bureau of Indian Affairs' mission is to enhance the quality of life, to promote economic opportunity, and to carry out the responsibility to protect and improve the trust assets of American Indians, Indian tribes and Alaska Natives.

BLM's Mission:

The BLM's mission is to manage and conserve the public lands for the use and enjoyment of present and future generations under our mandate of multiple-use and sustained yield.

TABLE OF CONTENTS

Chapter

Page

SUMMARY	S-I
Public Scoping Activities.....	S-3
Public Scoping Results.....	S-4
Issue Summary.....	S-5
Planning Criteria.....	S-6
Data Summary and Data Gaps	S-7
Future Steps	S-7
I. INTRODUCTION	I-1
I.1 Background.....	I-2
I.2 Purpose of and Need for the RMPA and EIS	I-3
I.2.1 Purpose of and Need for BLM Action.....	I-3
I.2.2 Purpose of and Need for BIA Action	I-4
I.3 Description of the Planning Area and Decision Areas	I-4
I.3.1 Planning Area	I-4
I.3.2 Decision Areas	I-5
I.4 Description of the Public Involvement Process.....	I-11
I.5 Description of the Scoping Process	I-12
I.5.1 Notice of Intent	I-12
I.5.2 Project Website	I-13
I.5.3 Mailing List and Newsletter.....	I-13
I.5.4 Press Releases and Other Media Coverage	I-13
I.5.5 Public Scoping Meetings	I-14
I.6 Cooperating Agency Coordination	I-15
I.7 Collaboration and Consultation with Tribes	I-17
2. COMMENT SUMMARY	2-1
2.1 Method of Comment Collection and Analysis	2-1
2.2 Summary of Public Comments	2-3
2.2.1 Written Submissions by Affiliation	2-3
2.2.2 Commenters by Geographic Area	2-4
2.2.3 Number of Comments by Process Category	2-6
2.3 Issues That Will be Addressed in the RMPA/EIS	2-11
2.3.1 Issues Identified in Additional Scoping.....	2-12
2.3.2 New In-Scope Issues from 2014 Scoping.....	2-14
2.4 Issues That Will Not be Addressed in the RMPA/EIS	2-15
2.4.1 Issues Related to Implementation.....	2-15
2.4.2 Issues Addressed in Other Planning Documents.....	2-16
2.4.3 Issues beyond the Scope of This RMPA/EIS	2-16
3. PLANNING CRITERIA.....	3-1
3.1 Original Planning Criteria	3-1
3.2 Additional Planning Criteria	3-3

4.	DATA SUMMARY/DATA GAPS	4-1
4.1	Summary of Available Relevant Information	4-1
4.2	Plans and Documents	4-1
4.2.1	Data.....	4-3
4.2.2	Additional Information Identified During Scoping	4-3
4.3	Data Gaps.....	4-3
5.	FUTURE STEPS	5-1
5.1	Summary of Future Steps and Public Participation Opportunities	5-1
5.2	Contact Information	5-2
6.	REFERENCES	6-1

TABLES		Page
1-1	BLM Decision Area	1-7
1-2	BIA Decision Area	1-11
1-3	Scoping Meetings.....	1-15
1-4	Cooperating Agency Participation.....	1-16
2-1	Submissions by Affiliation.....	2-3
2-2	Commenters by Geographic Area	2-5
2-3	Comments by Process Category	2-6
2-4	Comments by Resource Category.....	2-9

FIGURES		Page
1-1	Planning Area	1-6
1-2	BLM Surface and Mineral Decision Areas.....	1-7
1-3	BLM Decision Area	1-8
1-4	BIA Surface and Mineral Decision Areas	1-9
1-5	BIA Decision Area	1-10
2-1	Scoping Submission Comment Analysis	2-2
2-2	Submissions by Affiliation.....	2-4
2-3	Commenters by Geographic Area	2-5
2-4	Comments by Process Category	2-7
2-5	Comments by Resource Category.....	2-11

APPENDICES

A	List of Commenters
B	Scoping Comments and Summaries for the Mancos-Gallup RMPA/EIS (<i>found in Volume II</i>)
C	Scoping Materials, Media Releases, and Articles (<i>found in Volume II</i>)

ACRONYMS AND ABBREVIATIONS

Full Phrase

ACEC	area of critical environmental concern
APD	Application for Permit to Drill
BIA	United States Department of the Interior, Bureau of Indian Affairs
BLM	United States Department of the Interior, Bureau of Land Management
Chaco Culture NHP	Chaco Culture National Historic Park
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DOI	Department of the Interior
EIS	environmental impact statement
FFO	Farmington Field Office
FLPMA	Federal Land Policy and Management Act of 1976
GIS	geographic information system
NEPA	National Environmental Policy Act of 1969
NOA	Notice of Availability
NOI	Notice of Intent
NRO	Navajo Regional Office
RMP	resource management plan
RMPA	resource management plan amendment
ROD	record of decision

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SUMMARY

The United States Department of the Interior, Bureau of Land Management (BLM), Farmington Field Office (FFO) and Bureau of Indian Affairs (BIA), Navajo Regional Office (NRO) are preparing the Mancos-Gallup Resource Management Plan Amendment (RMPA) and Environmental Impact Statement (EIS). Its purpose is to update management of BLM-administered lands and mineral estate in the FFO and to evaluate alternatives and issues related to the BIA's authority over mineral leasing and associated activity decisions in the planning area.

Under the National Environmental Policy Act of 1969 (NEPA) and the Council on Environmental Quality's (CEQ) regulations for implementing the NEPA (40 Code of Federal Regulations [CFR], Parts 1500-1501), federal agencies are required to consider the environmental effects of their actions before taking such actions. Actions that are subject to NEPA include projects and programs that are entirely or partially financed, assisted, conducted, regulated, or approved by federal agencies; new and revised agency rules, regulations, plans, policies, or procedures; and legislative procedures (40 CFR, Subpart 1508.18). The actions proposed by the BLM and BIA as part of the Mancos-Gallup RMPA/EIS and the analysis conducted in the EIS are subject to the requirements of NEPA and other various relevant regulations.

Public involvement entails "The opportunity for participation by affected citizens in rule making, decision making, and planning with respect to the public lands, including public meetings or hearings...or advisory mechanisms, or other such procedures as may be necessary to provide public comment in a particular instance" (Federal Land Policy and Management Act of 1976 [FLPMA], Section 103[d]). The CEQ regulations, BLM planning regulations, and BIA NEPA Guidebook, 59 IAM 3-H.59, provide for specific points of public involvement in the land use planning and NEPA processes to address local, regional, and national interests (see 43 CFR, Subpart 1610.2, and 40 CFR, Subpart 1506.6).

The BIA and BLM have designed public involvement opportunities throughout the RMPA/EIS process to meet the requirements of FLPMA and NEPA.

Public involvement for this planning action will, at a minimum, include the following:

- Scoping meetings and other forms of outreach, requesting public comments to help determine the scope of issues and alternatives to be addressed
- Public outreach via newsletters, news releases, the project website, and other media
- Public review of draft alternatives summary information
- Public review of the Draft RMPA/EIS
- Public outreach via Tribal council and Chapter House meetings (see **Section 1.7**, Collaboration and Consultation with Tribes)

This report documents the results of the first component of the public involvement process, scoping. Chapters of this report are as follows:

- **Chapter 1, Introduction**, describes the purpose of and need for the RMPA/EIS, the planning area and decision areas, and the public scoping process.
- **Chapter 2, Comment Summary**, summarizes the volume of scoping submissions, geographic origin of submissions, commenter affiliations, comment categorization, and issues that will or will not be addressed in this RMPA/EIS.
- **Chapter 3, Planning Criteria**, outlines the established constraints, guidelines, and standards for the RMPA/EIS process.
- **Chapter 4, Data Summary and Data Gaps**, summarizes the available new and existing datasets that will potentially be used for this RMPA/EIS and identifies potential data gaps and limitations.
- **Chapter 5, Future Steps**, outlines the future steps of the RMPA/EIS process and identifies future opportunities for public involvement.
- **Chapter 6, References**, lists the references cited in this report.
- **Appendix A, List of Commenters**, lists the names of all commenters by affiliation.
- **Appendix B, Comment Summary Report**, includes all substantive comments organized by process and issue category and provides comment summaries by issue category.

- **Appendix C, Scoping Materials**, includes all materials, handouts, and news articles circulated to the public during the public scoping period.

PUBLIC SCOPING ACTIVITIES

In 2014, before the BIA became involved as a co-lead agency for this EIS, the BLM conducted an initial public scoping period. Public outreach during the initial scoping period was via the following:

- A project website (<https://www.blm.gov/programs/planning-and-nepa/plans-in-development/new-mexico/farmington-rmp-mancos-gallup-amendment>)
- A newsletter distributed to over 460 individuals on the project mailing list
- Press releases announcing the initial 60-day scoping period and a 30-day extension
- Newspaper, radio, and flyer advertisements in English and Navajo, announcing the meetings
- Three open house scoping meetings, one each in Farmington, Aztec, and Lybrook, New Mexico

The public scoping period began on February 25, 2014, with the publication of a Notice of Intent (NOI) in the *Federal Register*. All comments received on or before May 28, 2014, were included in the scoping report released in November 2014 (BLM 2014a) and are found on the project website. The issues and analysis documented in that 2014 scoping report are incorporated here by reference.

Several of the 2014 comments from the public asked why the BIA was not involved, and some identified issues that the BIA alone could address. These comments were considered out of scope at the time, given that the BIA was not involved. However, as the BIA is now a co-lead agency, the 2014 scoping comments were reanalyzed, and any related to the BIA or its decision space were brought forward for consideration in the EIS.

On October 21, 2016, the BIA and BLM published an NOI in the *Federal Register*, announcing that the BIA had formally joined the EIS process as a co-lead agency. The NOI initiated a 60-day scoping period, which was later extended to 120 days. Public outreach for this scoping period was through the following means:

- Updates to the project website
- A newsletter distributed to more than 440 individuals, agencies, and organizations on the project mailing list

- Press releases announcing the 60-day scoping period and a 60-day extension
- Newspaper, radio, and flyer advertisements in English and Navajo, announcing the meetings
- Ten scoping meetings

Open house scoping meetings included a presentation in Navajo and English, and an opportunity for public comments. Resource specialists from the BIA and BLM attended the meetings, and Navajo and English handouts and relevant project posters were displayed. Nine of these meetings were held in New Mexico; one was hosted in Window Rock, Arizona.

The public scoping period began on October 21, 2016, and all comments received or postmarked by February 26, 2017, are included in this scoping report. To assure that all comments transmitted during the February 20, 2017, holiday were received and included, the scoping period was informally extended to February 26, 2017. Note, however, that the 2016–2017 scoping did not reopen the issues and planning criteria related to the BLM’s decisions to be considered in the EIS. The outcomes of both scoping periods, in 2014 and the one documented in this report, will continue to shape the RMPA/EIS process.

PUBLIC SCOPING RESULTS

During this second public scoping period, the BIA and BLM accepted written or transcribed comments on the project. Each submission was reviewed for substantive or meaningful content and was separated into discrete comments. Substantive comments are those that have a firm basis in reality, raise issues or information that the BLM and BIA may not have considered, present meaningful information that could be used in alternatives development, recommend specific changes to current management practices, and/or question with reasonable basis the accuracy of information in past reports or analysis. A single submission could contain multiple comments on various aspects of the project. The comments were organized by topic, entered into the BLM’s ePlanning CommentWorks comment database, and grouped into categories.

The BIA and BLM received a total of 1,694 unique written and spoken submissions and 15,114 electronic form letter submissions, resulting in 3,736 discrete comments. These comments were then sorted by content into Process Categories and Planning Issues. The number of comments by Process Category/Issue (4,073) exceeds the total number of discrete comments (3,736), because some comments were deemed important to consider under more than one planning issue.

Of these, 4,045 (99 percent) concerned planning issues that the BIA will analyze in the EIS. These included general comments on the RMPA/EIS and comments related to specific resource topics. The BIA and BLM further categorized comments on issues to be analyzed in the EIS by resource topic for analysis. The

BIA and BLM received 3,563 such comments. These comments related to primary resource categories for which management decisions will be made (1,271 total comments on the subjects of oil and gas, lands and realty, lands with wilderness characteristics, and vegetation), as well as other resources and resource uses that may be impacted by proposed management actions (2,292 total comments). The remaining 28 comments (less than 1 percent) concerned issues that will not be directly addressed in the RMPA/EIS. Such issues are those that the BIA and BLM have addressed in other planning efforts (less than 1 percent of total comments), those related to implementation-level decisions (less than 1 percent), or those beyond the scope of the RMPA/EIS (less than 1 percent).

Federal agencies provided 5 written submissions (less than 1 percent), state agencies provided 5 written submissions (less than 1 percent), and local government agencies provided 3 submissions (less than 1 percent).

Individuals provided 91 percent of submissions. Nonprofit or citizen groups submitted 2.9 percent of all submissions. Individuals who identified Tribal affiliations submitted 2.8 percent, Tribal governments submitted less than 1 percent, representatives from businesses submitted less than 1 percent, and educational institutions submitted less than 1 percent of comments. The BIA and BLM also received twelve anonymous comments, accounting for less than 1 percent of submissions. **Appendix A** is a list of commenters and their affiliations.

ISSUE SUMMARY

Through internal and initial public scoping, the BLM and BIA identified planning issues in four major categories:

- Issue 1. Oil and gas development
- Issue 2. Lands and realty
- Issue 3. Lands with wilderness characteristics
- Issue 4. Vegetation management

Based on the public comments, the four initial planning issues were carried forward. Note that lands with wilderness characteristics are only a planning issue for the BLM.

In addition to submitting general comments on the planning process, commenters also identified a range of other issues that would be affected by decisions related to BIA mineral leasing and associated activities. Commenters requested that these issues be considered in the EIS analysis; they are summarized in the list below, and additional detail is provided in **Section 2.3, Issues That Will be Addressed in the RMPA/EIS**.

- Air resources
- Climate change
- Noise
- Recreation and night sky
- Cultural resources
- Soil resources
- Water resources
- Socioeconomics
- Environmental justice
- Wildlife
- Special status species
- Hazardous materials
- Traffic and roads
- Tribal interests and trust responsibilities
- Chaco cultural landscape
- Chaco Culture National Historic Park
- Public health and safety
- Visual resources
- Livestock grazing
- Geology and seismic activity

During this second scoping period, the BIA and BLM revisited the comments submitted during the 2014 scoping period. Some comments were considered outside the scope of the planning process at that time, because they were related to BIA authority over mineral leasing and associated activities. Because these topics are now in the scope of the Mancos-Gallup RMPA/EIS, these comments are included in this scoping report and will be considered along with other comments submitted during the scoping periods. The BIA and BLM will use both the internal planning issues and those identified in public comments to guide the EIS alternatives development and analysis.

PLANNING CRITERIA

During the BLM's initial planning sessions and internal scoping in 2013 and 2014, FFO staff developed preliminary planning criteria, which were published in the BLM's NOI on February 25, 2014, and were presented for public comment. The BIA's additional planning criteria were published in the October 21, 2016, NOI. Planning criteria help planners define the scope of the amendment process and estimate the extent of data collection and analysis.

Planning criteria are based on the following:

- Standards prescribed by applicable laws and regulations
- Agency guidance
- Results of consultation and coordination with the public and other federal, state, and local agencies
- Analysis of information pertinent to the planning area
- Professional judgment

See **Section 3.1** for detailed information and a list of the BLM and BIA planning criteria.

DATA SUMMARY AND DATA GAPS

The BIA and BLM will use both new data and existing resource information to formulate management alternatives in the RMPA/EIS. To facilitate this process, they are compiling digital geographic information system (GIS) datasets for use in analysis and map production. Because this information is necessary to quantify resources, update maps, and manipulate information during alternative formulation, this process must be completed before actual analysis can begin.

The BIA and BLM received suggestions during scoping about studies to review, information to analyze, documents to consider as guidance, descriptions of existing landscape conditions, and examples of related information (see **Chapter 4**, Data Summary/Data Gaps, for details). The BIA and BLM will consider these suggestions during RMPA/EIS development. They will use the best available data pertinent to the analysis, knowledge of the planning area, and professional judgment. The two agencies will gather data for the EIS throughout the RMPA/EIS process, to ensure that data gaps are minimized.

FUTURE STEPS

The next phase of the BIA and BLM's planning process is to develop and refine the range of preliminary alternatives, based on the issues presented in this scoping report. The BIA and BLM will provide preliminary alternative summary information to the public for review and comment.

After refining the alternatives based on public input, the BIA and BLM will document the analysis of the alternatives and will identify a preferred alternative in a Draft RMPA/EIS. The BIA and BLM will distribute the draft document, anticipated to be published in fall 2018, to elected officials, regulatory agencies, and members of the public. They will also make the draft document available on the project website.

The agencies will announce the availability of the draft document via a Notice of Availability (NOA) in the *Federal Register*, and a 90-day public comment period

will follow. They will hold public meetings in and near the planning area during the 90-day comment period.

For complete details regarding future steps in the planning amendment and NEPA process, see **Chapter 5**, Future Steps.

At the conclusion of the Draft RMPA/EIS public comment period, the BIA and BLM will review and analyze public comments and determine what changes need to be made to the document. They will then revise the Draft RMPA/EIS, will prepare a Proposed RMPA/Final EIS, and will publish it. The BIA and BLM will announce the availability of the Proposed RMPA/Final EIS in the *Federal Register*. They will post all publications on the project website, including this report, newsletters, the Draft RMPA/EIS, and the NOA, as well as pertinent dates for soliciting public comments.

CHAPTER I

INTRODUCTION

The United States Department of the Interior, Bureau of Land Management (BLM), FFO published an environmental impact statement (EIS) and Resource Management Plan (RMP) in 2003 to outline management decisions and guidance for the FFO (BLM 2003). In 2012, the BLM determined that, due to changes in extractive technologies, it would engage in an RMP Amendment (RMPA) to examine any differences in impacts from using these technologies. Such new technologies are facilitating additional extraction and associated surface disturbance in what was previously considered a fully developed oil and gas field on portions of the FFO.

Because of this, the BLM FFO began preparation of the Mancos-Gallup RMPA and EIS to update management of BLM-administered lands and mineral estate within the FFO. The RMPA/EIS and initial scoping period were announced in an NOI published in the *Federal Register* on February 25, 2014. In 2016, the BIA NRO became a co-lead agency due to the shared concerns and management responsibilities related to oil and gas development in the planning area. The NOI announcing the BIA joining the project was published in the *Federal Register* on October 21, 2016.

This report documents the results of the recently completed BIA public scoping period. Chapters of this report are as follows:

- **Chapter 1, Introduction**, describes the purpose of and need for the RMPA/EIS, the planning area and decision areas, and the public scoping process.
- **Chapter 2, Comment Summary**, summarizes the volume of scoping submissions, geographic origin of submissions, commenter affiliations, comment categorization, and issues that will or will not be addressed in the RMPA/EIS.

- **Chapter 3, Planning Criteria**, outlines the established constraints, guidelines, and standards for the RMPA/EIS process.
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I.1 BACKGROUND

Oil and gas development activities and other resource programs on BLM-administered lands and federal mineral estate in the planning area are currently managed according to land use decisions set by the 2003 RMP, the visual resources plan amendment completed in 2014 (BLM 2014b), and the Glade Run Recreation Area plan amendment completed in 2015 (BLM 2015). As part of this RMPA/EIS, the BLM and BIA are analyzing oil and gas leasing and development, along with two related issues: realty actions and vegetation management. The BLM will also analyze lands with wilderness characteristics.

As a co-lead agency, the BIA intends to use this planning effort to evaluate alternatives and issues related to its authority over mineral leasing and associated activity decisions in the planning area. The BIA NRO has the responsibility to manage fluid and solid mineral leasing for Indian mineral owners, including the Navajo Nation on Tribal trust lands and individual Navajo allottees on their trust lands. These responsibilities require coordinating with the BLM and other agencies whose roles are specified in an interagency agreement (BIA et al. 2013). For example, the BIA is responsible for approving and completing NEPA compliance for new leases and assignments on Tribal minerals; the BLM is responsible for approving and completing the NEPA obligations and other compliance actions for Applications for Permit to Drill (APDs). Both agencies work closely with the Federal Indian Minerals Office, which assists allottees regarding all aspects of their mineral interests.

As mentioned previously, the initial scoping period occurred in early 2014 and offered the public an opportunity to comment on planning criteria and issues

related to the BLM's process. After the BIA became a co-lead agency for the RMPA/EIS, a second round of public scoping was conducted from October 2016 through February 2017. The purpose of this scoping process was to seek public input on issues and planning criteria specifically related to the analysis of BIA mineral leasing and associated activity decisions to be considered in the EIS. This 2016/2017 scoping effort did not, however, reopen the issues and planning criteria related to the BLM's decisions to be considered in the EIS. Based on scoping input and the difference in the two agencies' missions, some actions proposed in the alternatives may differ for each agency.

Applying information gathered during scoping, the BLM and BIA will develop a range of reasonable alternatives and seek input from the public, cooperating agencies, and interested Tribes. Information gathered during this process will be incorporated and the alternatives modified where appropriate. The BLM and BIA will then conduct detailed impact analyses of the alternatives in a publicly available draft EIS. The BLM and BIA will solicit input on the draft EIS during a 45-day comment period, and necessary changes will be incorporated and additional analyses may be conducted. All revisions will be captured in the final EIS; the NOA for the final EIS will be published in the *Federal Register* announcing a 30-day public review period. Following the resolution of any protests, the BLM could sign a record of decision (ROD) on the approved RMPA for the lands it administers and for federal mineral estate. The BIA could sign a ROD for the EIS related to Tribal trust and allotted lands and Indian mineral interests. The agencies may also decide to sign a single joint ROD at the Secretarial level.

Under NEPA and the CEQ regulations for implementing NEPA (40 CFR 1500-1501), federal agencies are required to consider the environmental effects of their actions prior to taking such actions. Actions that are subject to NEPA include projects and programs that are entirely or partially financed, assisted, conducted, regulated, or approved by federal agencies; new and revised agency rules, regulations, plans, policies, or procedures; and legislative procedures (40 CFR 1508.18). The actions proposed by the BLM and BIA as part of the Mancos-Gallup RMPA/EIS and the analysis conducted in the EIS are subject to the requirements of NEPA and various other relevant regulations.

I.2 PURPOSE OF AND NEED FOR THE RMPA AND EIS

I.2.1 Purpose of and Need for BLM Action

For the BLM, the primary purpose of this planning action is to allow for changing patterns of land use, while accomplishing resource objectives and providing for multiple use and valid existing rights. This will be accomplished by amending the 2003 RMP to further analyze the potential impacts on the FFO due to changing technologies that may result in more wells, surface disturbances, and impacts in the FFO than were anticipated in the 2003 RMP. Additional needs for this amendment are to analyze realty actions, vegetation management, and identify lands with wilderness characteristics in the FFO.

In addition to other related laws, rules and regulations, the need for planning is established by BLM requirements and authority under the following:

- NEPA
- Mineral Leasing Act of 1920 as amended
- Mining and Minerals Policy Act of 1970
- Federal Land Policy and Management Act of 1976 (FLPMA)
- National Materials and Minerals Policy
- Research and Development Act of 1980
- Federal Onshore Oil and Gas Leasing Reform Act of 1987
- BLM Land Use and Planning Handbook (H-1601-1)
- BLM Manual 6320

I.2.2 Purpose of and Need for BIA Action

For the BIA, the purpose of the EIS is to analyze and mitigate the potential impacts of oil and gas development and associated activities on the Navajo Communities in the planning area. By mitigating the potential impacts, the NRO goals are to enhance the quality of life, facilitate economic opportunity, and protect and improve the trust assets of the Navajo Nation and Navajo allottees. This includes managing the fluid and other mineral estates for the Navajo Nation and Navajo allottees.

In addition to other related laws, rules, and regulations, the need for this EIS is established by BIA requirements and authority under the following:

- NEPA
- Mineral Leasing Act of 1920 as amended (MLA)
- Mining and Minerals Policy Act of 1970
- Federal Land Policy and Management Act of 1976 (FLPMA)
- Indian Mineral Leasing Act of 1938 (25 USC, Subsections 396a-g)
- Indian Mineral Development Act of 1982 (25 USC, Sections 2101 et seq.)
- 25 CFR 169 (25 USC, Section 323)
- BIA Fluid Mineral Estate Procedural Handbook (2012)

I.3 DESCRIPTION OF THE PLANNING AREA AND DECISION AREAS

I.3.1 Planning Area

The planning area consists of a portion of the FFO and NRO in San Juan, Rio Arriba, McKinley, and Sandoval Counties, and encompasses 4,188,500 acres,

including lands managed by the BLM, BIA (Tribal trust lands and individual Indian allotments), State trust lands, US Forest Service lands, National Park Service lands, US Bureau of Reclamation lands, New Mexico Game and Fish lands, and private property (**Figure I-1**, Planning Area). Because landownership in the southern portion of the planning area is generally made up of smaller isolated parcels under different ownership, it is often referred to as a “checkerboard.”

Population centers within the planning area are generally located in the northern portion and include Farmington, Aztec, and Bloomfield. Smaller communities such as Lybrook and Nageezi are located along the US 550 corridor that runs southeast to northwest through the planning area. Cuba, Gallup, Crownpoint, and Shiprock, also population centers within the FFO, fall outside of the current planning area (see **Figure I-1**, Planning Area).

I.3.2 Decision Areas

In total, between the administrative authority of the BLM and the BIA, the decision areas equal approximately 71 percent of the planning area.

Much of the mineral estate in the decision area (area where the BLM and/or BIA have administrative authority) is already leased. Approximately 2 million acres are covered by 3,000 active leases. Most of these active leases have approved APDs. Existing leases would not be subject to new stipulations, but new stipulations may apply to leases that have expired or to new proposed work on existing leases. Similarly, already approved APDs would not be subject to new conditions of approval (COAs) analyzed in the RMPA/EIS. However, new or significantly modified APDs on existing leases could be subject to new COAs, and new leases would be subject to the stipulations outlined in the EIS and adopted by the BLM and BIA.

BLM Decision Area

The BLM decision area for the RMPA/EIS includes only the surface land and subsurface mineral estate within the planning area for which the BLM has authority to make land use and management decisions. This includes some subsurface mineral estate underlying Tribal trust surface lands within the decision area.

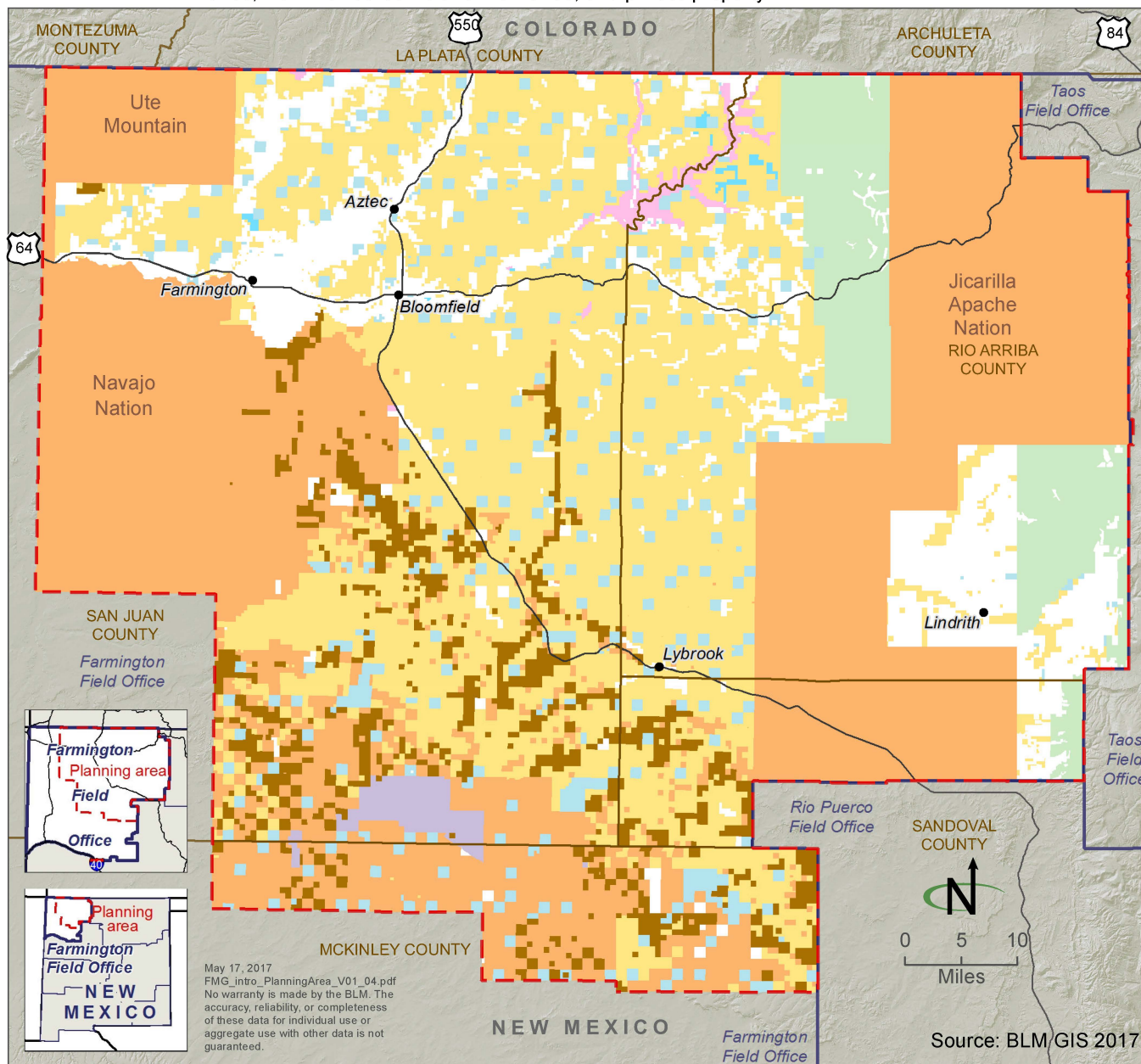
The total BLM decision area is made up of approximately 2.3 million acres of BLM-administered surface lands and federal mineral estate. In some portions of the planning area, the BLM administers the surface lands, while the mineral estate is owned by another entity. In other areas, the BLM administers federal mineral estate, while the surface is owned or managed by another entity. This can happen as a result of land exchanges that did not include mineral transfers, or other related trades or acquisitions.



Figure 1-1 Planning Area



The planning area consists of a portion of the FFO and NRO in San Juan, Rio Arriba, McKinley, and Sandoval Counties, including lands managed by the BLM, BIA (Tribal trust lands and individual Tribal allotments), State trust lands, US Forest Service lands, National Park Service lands, US Bureau of Reclamation lands, New Mexico Game and Fish lands, and private property.



Surface Administration

- Tribal trust land
- Tribal allotted land
- BLM
- Private
- US Forest Service

- State trust
- National Park Service
- Bureau of Reclamation
- NM Game and Fish

- Planning area
- Field office boundary

Because of these areas where the surface and minerals are owned or managed by two different entities, there are two different decision areas for the BLM in this RMPA/EIS. The BLM surface decision area includes all surface land administered by the BLM. Some of the minerals beneath this surface land are administered by the BLM, and some are owned by other entities. The BLM mineral decision area includes all federal mineral estate administered by the BLM. Some of the surface land above this federal mineral estate is administered by the BLM, and some is owned or administered by other entities. **Figure I-2, BLM Surface and Mineral Decision Areas**, illustrates the differences in the two decision areas for the BLM. **Table I-1** and **Figure I-3, BLM Decision Area**, show the total BLM decision area and each type of surface or mineral estate within it.

Figure I-2
BLM Surface and Mineral Decision Areas

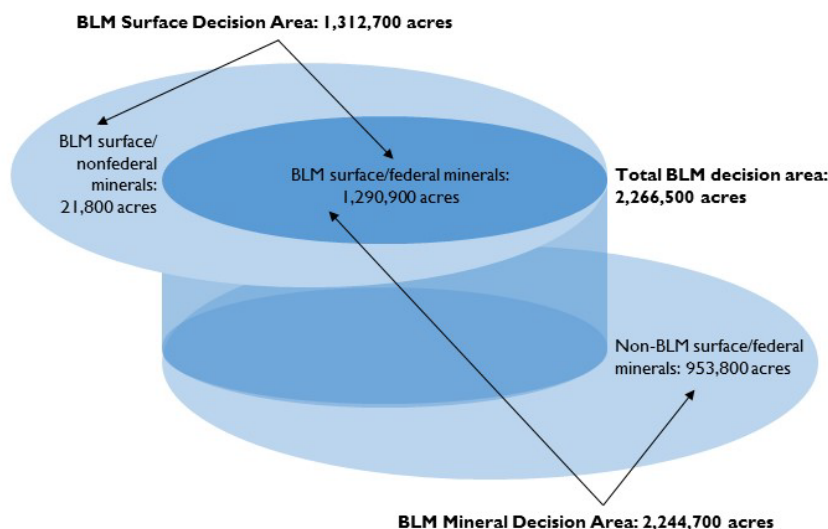


Table I-1
BLM Decision Area¹

	Acres
BLM surface land and federal mineral estate	1,290,900
Non-BLM surface land and federal mineral estate ²	953,800
BLM surface land and nonfederal mineral estate	21,800
Total BLM decision area	2,266,500

Source: BLM GIS 2017

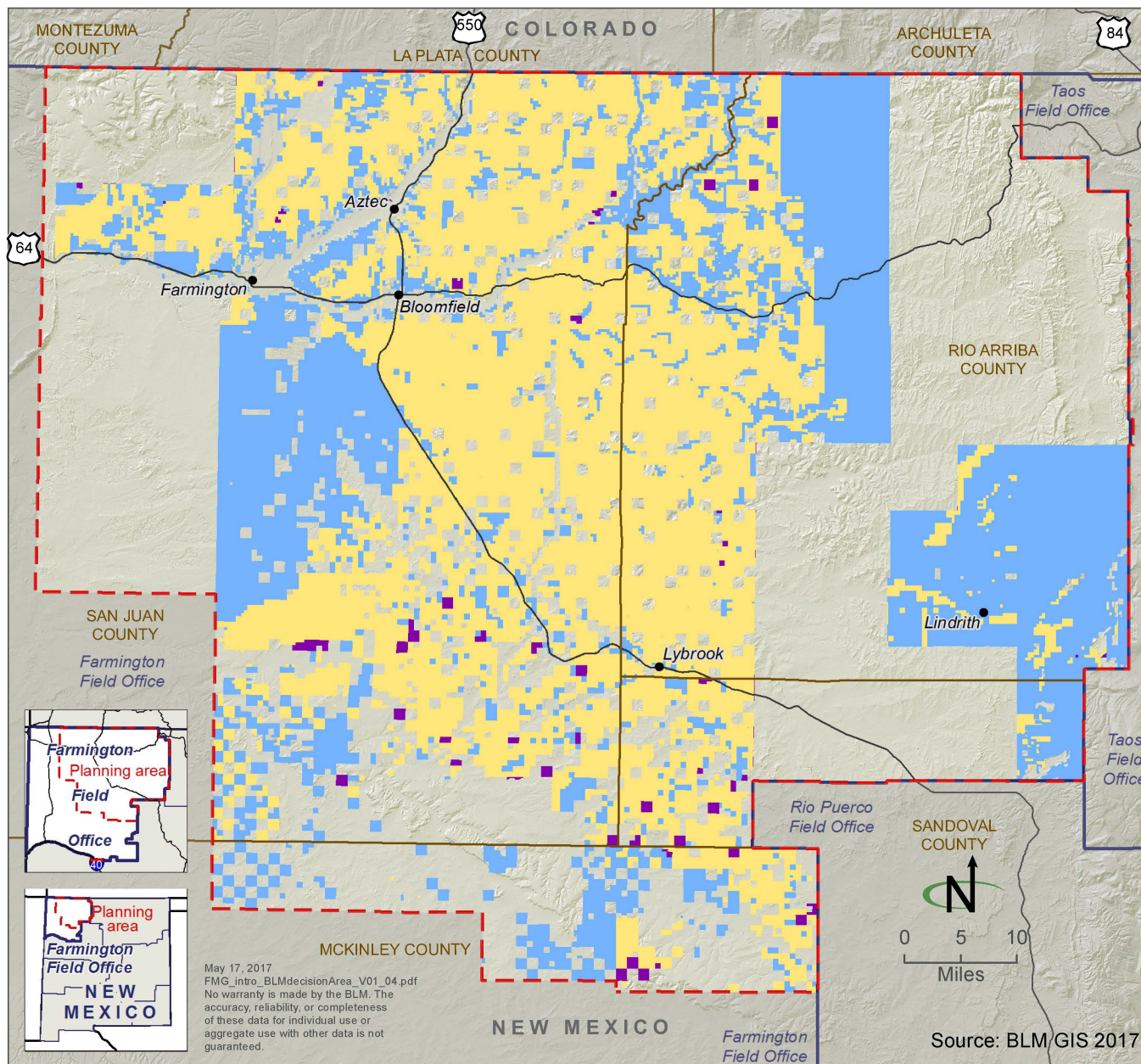
¹ Includes BLM surface and mineral decision areas

² Includes approximately 300,000 acres of Tribal trust surface land



**Figure 1-3
BLM Decision Area**

The BLM decision area for the RMPA/EIS includes only the surface lands and federal mineral estate within the planning area for which the BLM has authority to make land use and management decisions.



BLM Decision Area

- BLM surface land and federal mineral estate
- Non-BLM surface land and federal mineral estate
- BLM surface land and nonfederal mineral estate

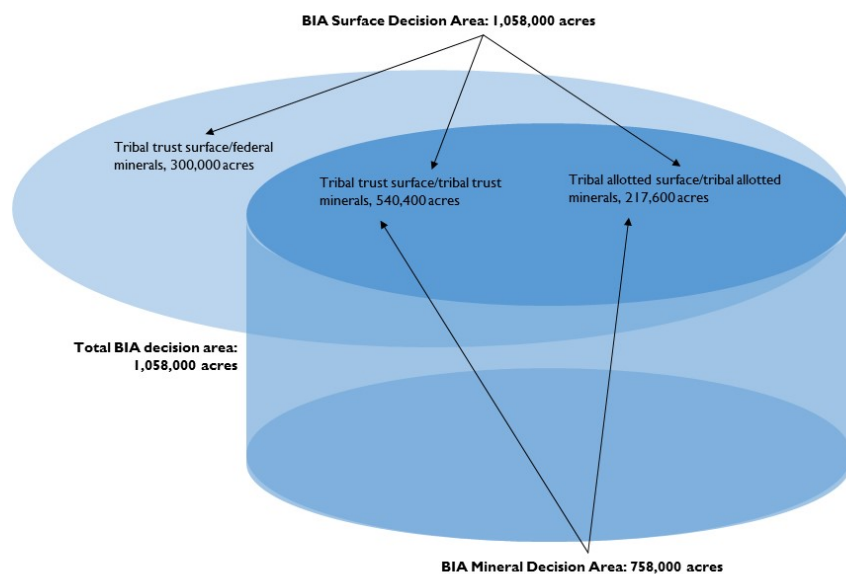
- Planning area
- Field office boundary

BIA Decision Area

The BIA decision area includes only the surface lands and subsurface mineral estate within the planning area for which the BIA NRO has authority to make decisions regarding mineral leasing and associated activities. The BIA decision area includes approximately 1.1 million surface acres divided between Navajo Tribal trust and Navajo Tribal allotments. Tribal trust lands of the Jicarilla Apache Nation and the Ute Mountain Ute Tribe are not part of the decision area, although they are part of the planning area due to adjacent or nearby parcels of BLM-administered lands and federal mineral estate.

As described for the BLM decision area, Tribal trust and allottee lands do not always include subsurface mineral rights. In some cases, these remain as federal mineral estate. Therefore, there are also two different decision areas for the BIA in this RMPA/EIS. The BIA surface decision area includes all Tribal trust and allotted surface land. Some of the minerals beneath this surface land are Tribal trust and allotted minerals, and some are administered by the BLM. The BIA mineral decision area includes all Tribal trust and allotted mineral estate. All of the surface land above this mineral estate is also Tribal trust or allotted. **Figure I-4, BIA Surface and Mineral Decision Areas**, illustrates the differences in the two decision areas for the BIA. **Table I-2** and **Figure I-5, BIA Decision Area**, show the total BIA decision area and each type of surface or mineral estate within it. In addition, the BLM approves APDs for all federal mineral development, including those for leases under BIA authority.

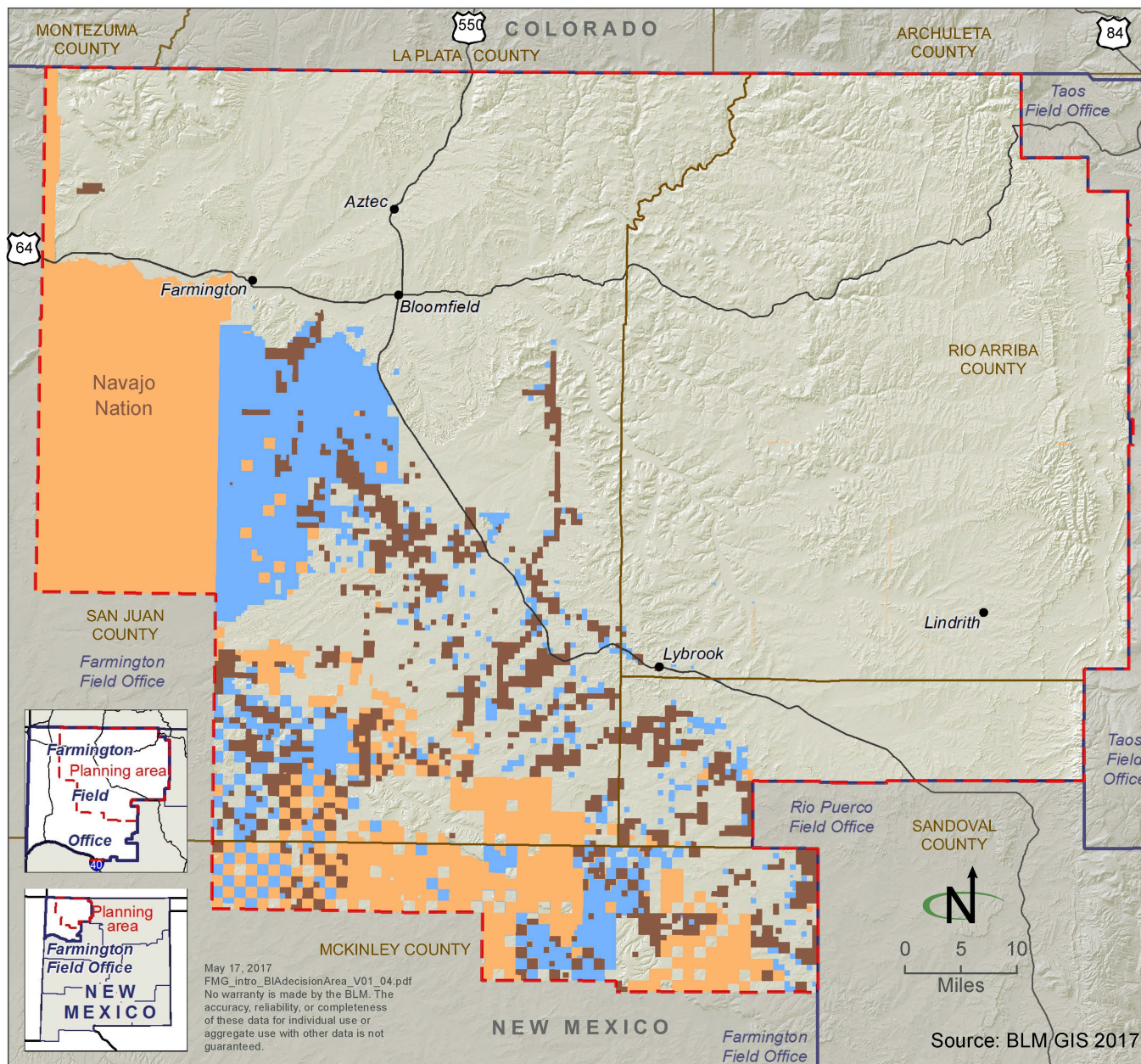
Figure I-4
BIA Surface and Mineral Decision Areas





**Figure 1-5
BIA Decision Area**

The BIA decision area includes the surface lands and subsurface mineral estate in the planning area for which the BIA NRO has authority to make decisions regarding mineral leasing and associated activities. Tribal trust lands of the Jicarilla Apache Nation and the Ute Mountain Ute Tribe are not part of decision area.



BIA Decision Area

- Tribal trust surface land and Tribal trust subsurface mineral estate
- Tribal trust surface land and federal mineral estate
- Tribal allotted surface land and Tribal allotted subsurface mineral estate

- Planning area
- Field office boundary

**Table I-2
BIA Decision Area¹**

	Acres
Tribal trust surface land and Tribal trust subsurface mineral estate	540,400
Tribal trust surface land and federal mineral estate ²	300,000
Tribal allotted surface land and Tribal allotted subsurface mineral estate	217,600
Total BIA decision area	1,058,000

Source: BLM GIS 2017

¹ Includes BIA surface and mineral decision areas; BLM has permitting authority for oil and gas development on Tribal trust and allotted subsurface mineral estate.

² BLM has oil and gas leasing authority for these lands.

I.4 DESCRIPTION OF THE PUBLIC INVOLVEMENT PROCESS

Public involvement entails “The opportunity for participation by affected citizens in rule making, decision making, and planning with respect to the public lands, including public meetings or hearings...or advisory mechanisms, or other such procedures as may be necessary to provide public comment in a particular instance” (FLPMA, Section 103[d]). The CEQ regulations, BLM planning regulations, and the BIA NEPA Guidebook, 59 IAM 3-H.59, provide for specific points of public involvement in the land use planning and NEPA processes to address local, regional, and national interests (see 43 CFR, Subpart 1610.2, and 40 CFR, Subpart 1506.6). The BIA and BLM have designed public involvement opportunities throughout the RMPA/EIS process to meet the requirements of FLPMA and NEPA.

Public involvement for this planning process will at a minimum include the following:

- Scoping meetings and other forms of outreach, requesting public comments to help determine the scope of issues and alternatives to be addressed
- Public outreach via newsletters, news releases, the project website, and other media
- Public review of draft alternatives summary information
- Public review of the Draft RMPA/EIS
- Public outreach via Tribal council and Chapter House meetings

This scoping report documents the results of the first component of the public involvement process, scoping.

I.5 DESCRIPTION OF THE SCOPING PROCESS

Scoping is an early and open process, through which cooperating agencies and interested persons are identified and the significant issues and alternatives to be addressed in the EIS are determined. The intent of scoping is to focus the analysis on significant issues and reasonable alternatives, to eliminate extraneous discussion, and to reduce the length of the EIS. Formal public scoping begins after publication of an NOI in the *Federal Register*; however, informal internal and external scoping may occur before the formal scoping period begins.

The CEQ regulations at 40 CFR, Subpart 1501.7, require the following in an agency's scoping process:

- Invite participation from affected federal, Tribal, state, and local organizations, and interested persons
- Determine the scope or extent of the EIS and the significant issues to be analyzed; scoping is valuable in identifying connected, cumulative, and similar actions
- Eliminate those issues raised that are not related to potentially significant impacts or those that have been covered in other environmental documents
- Make assignments for preparing the EIS between the lead and cooperating agencies
- Identify any environmental documents being prepared that have relevance to, but are not part of, the scope of the EIS
- Identify other environmental review and consultation requirements
- Discuss the relationship between the timing of the EIS preparation and the agency's tentative planning and decision-making schedule

The BIA and BLM made additional efforts to ensure effective communication with planning area communities and to accommodate various preferred methods of providing input to the agencies. All public service announcements, flyers, and meeting handouts, and many of the public meetings, were presented in both English and Navajo to overcome known language barriers. Ten public scoping meetings were held around the Navajo Nation to allow residents living in remote communities to attend and participate. Based on feedback after the first public scoping meeting, the BIA and BLM provided opportunities for the public to give oral comments in English or Navajo at each subsequent meeting. These comments were documented, translated as needed, and analyzed along with written comment submissions.

I.5.1 Notice of Intent

On October 21, 2016, the BIA and BLM published an NOI to identify issues specifically related to analyzing BIA-administered mineral leasing and associated activity decisions (81 *Federal Register* 72819). The NOI initiated the formal public

scoping period. The BIA and BLM initially decided to open the scoping period for 60 days rather than the required 30 days; however, after requests from the public, the agencies extended the scoping period for an additional 60 days, for a total of 120 days of public scoping ending on February 20, 2017. To assure that all comments transmitted during the February 20, 2017, holiday were received and included, the scoping period was informally extended to February 26, 2017.

This report includes all comments received or postmarked by February 26, 2017. Although comments received after the close of the formal public scoping period are not addressed in this scoping report, the BIA and BLM will consider all comments received during public scoping in the planning process.

I.5.2 Project Website

The BLM maintains the project website to keep the public informed about the RMPA/EIS process. The website, at <https://www.blm.gov/programs/planning-and-nepa/plans-in-development/new-mexico/farmington-rmp-mancos-gallup-amendment>, contains background information, maps, status updates, and other material.

I.5.3 Mailing List and Newsletter

In November 2016, the BLM mailed a newsletter, announcing the public scoping period, to more than 440 individuals, agencies, and organizations. It provided the dates and venues for eight scoping meetings (see **Section 1.5.5**, Public Scoping Meetings) and a description of the various methods for submitting comments, including dedicated email and US Postal Service mail addresses.

In January 2017, a second postcard was sent to those on the mailing list announcing two additional scoping meetings, in Farmington and Shiprock, New Mexico.

I.5.4 Press Releases and Other Media Coverage

A press release announcing the scoping period was sent to local media outlets. It provided the dates and locations of the scoping meetings (see **Section 1.5.5**, Public Scoping Meetings) and described the various methods for submitting comments.

A public service announcement recorded in Navajo was sent to seven radio stations in and near the planning area, advertising the dates and locations of public meetings:

- KUYI—AM 88.1, Hopi Radio, broadcasting from Polacca, Arizona
- KTTN—AM 660, The Voice of the Navajo Nation, broadcasting from Window Rock, Arizona
- KGAK—AM 1330, All Navajo All the Time, broadcasting from Gallup, New Mexico

- KNDN—AM 960, All Navajo Radio, broadcasting from Farmington, New Mexico
- KGLP—FM 91.7, Gallup Public Radio, broadcasting from Gallup, New Mexico
- KGHR—FM 91.3, Navajo Public Radio, broadcasting from Tuba City, Arizona
- KYAT—FM 94.5, Ya'a'te'eh Diné, broadcasting from Gallup, New Mexico

Informational flyers were also distributed at businesses and government offices in the New Mexico communities of Counselor, Crownpoint, Farmington, Huerfano, Nageezi, Ojo Encino, and Shiprock, along with Window Rock in Arizona.

A second press release, issued on December 1, 2016, notified the public of the 60-day extension to the scoping period and reiterated how the public could submit comments and the point of contact for additional information. The press release was published on the BLM's Spotlight website.

The *Daily Times* (Farmington), the *New Mexican* (Santa Fe), the *Navajo Times* (Window Rock), the *Herald* (Durango), and the *Talon* (Aztec) published articles covering the RMPA/EIS and scoping period (see **Appendix C**, Scoping Materials, Media Releases, and Articles).

I.5.5 Public Scoping Meetings

At the 10 scoping meetings, the BLM and BIA provided the public with opportunities to become involved, to learn about the project and the planning process, to offer comments, to meet the BIA and BLM's Mancos-Gallup RMPA/EIS team members, and to offer comments. As shown in **Table I-3**, below, 821 people signed in at the meetings. The meetings were advertised via press release, the project newsletter, the project website, the radio public service announcements, and the informational flyers.

Each meeting started with introductions and a welcome message from BIA and BLM managers and Chapter House presidents or hosts, if present. Next, a PowerPoint presentation provided an overview of the RMPA/EIS process and opportunities for public involvement. The slides were written in English, and the presentation was narrated in Navajo. After the presentation, members of the public were invited to provide oral comments. They spoke in the order in which they signed up. Their remarks were limited to between 3 and 5 minutes, depending on the number of people who had requested an opportunity to speak. These oral comments, whether provided in English or Navajo, were recorded for transcription. After oral comments were concluded, the public was encouraged to visit display boards and stations set up for five separate resource topics and an interactive GIS station. At the request of the BIA, the

**Table I-3
Scoping Meetings**

Location	Venue	Date	Number of Attendees
Shiprock, New Mexico	Shiprock Chapter House	November 10, 2016	35
Huerfano, New Mexico	Huerfano Chapter House	November 10, 2016	24
Counselor, New Mexico	Counselor Chapter House	November 12, 2016	25
Nageezi, New Mexico	Nageezi Chapter House Gymnasium	November 12, 2016	38
Ojo Encino, New Mexico	Ojo Encino Chapter House	November 14, 2016	32
Whitehorse Lake, New Mexico	Whitehorse Lake Chapter House	November 15, 2016	64
Crownpoint, New Mexico	Navajo Technical University	November 17, 2016	41
Window Rock, Arizona	Navajo Nation Museum	December 2, 2016	357
Farmington, New Mexico	San Juan College	February 1, 2017	124
Shiprock, New Mexico	Shiprock Chapter House	February 2, 2017	81
Total			821

public meeting at the Whitehorse Lake Chapter House was conducted in Navajo, with English limited to certain explanations for non-Navajo speakers.

Participants were encouraged to discuss concerns and questions with BIA and BLM staff representatives. Comment cards, a guide to providing substantive comments, and handouts with information on each resource topic were available at the sign-in station and around the room. All handouts, including comment cards, were available in English and Navajo. In addition, two Navajo interpreters and translators were available to answer questions, interpret materials, and transcribe verbal comments.

Resource posters and maps were displayed, showing the planning area, authorized rights-of-way, cultural resources and site density, federal mineral estate, and grazing allotments. Resource fact sheets and project-related handouts provided an overview of current management practices and issues associated with each resource.

I.6 COOPERATING AGENCY COORDINATION

On February 26, 2014, the BLM sent written invitations to eligible federal agencies, state and local governments, and federally recognized Native American Tribes to participate as cooperating agencies during the development of the RMPA/EIS. These agencies were invited to participate because they have jurisdiction by law or special expertise. 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 [BLM 2005]). After the BIA became a co-lead agency for the RMPA/EIS, it and the BLM sent new invitations to potential cooperating agencies on April 25, 2017. To date, seven

agencies have agreed to participate in the RMPA/EIS process as designated cooperating agencies, one agency declined, and the remainder have not responded (**Table I-4**, Cooperating Agency Participation).

Table I-4
Cooperating Agency Participation

Agency/Tribe Invited to be a Cooperating Agency	Status
US Department of Agriculture, Forest Service, Carson National Forest, Jicarilla Ranger District	Accepted
Navajo Nation	Accepted
Navajo Nation, Historic Preservation Department/Traditional Culture Program	Accepted
New Mexico Department of Cultural Affairs, Historic Preservation Division	Accepted
New Mexico Department of Game and Fish	Accepted
US Department of Agriculture, Forest Service, Santa Fe National Forest	Accepted
US Department of the Interior, National Park Service, Chaco Culture National Historic Park	Accepted
US Department of the Interior, Bureau of Reclamation, Western Colorado Area Durango Field Office	Declined
US Environmental Protection Agency, Region 6	Pending
Advisory Council on Historic Preservation	Pending
City of Aztec	Pending
City of Bloomfield	Pending
City of Farmington	Pending
Counselor Chapter House	Pending
Hopi Tribal Council	Pending
Jicarilla Apache Nation	Pending
Kewa Pueblo	Pending
La Plata County, Colorado	Pending
National Resources Conservation Service	Pending
Navajo Nation Land Department	Pending
New Mexico Department of Game and Fish, Northwest Area	Pending
New Mexico Department of Transportation, Environmental Design Bureau	Pending
New Mexico Energy, Minerals and Natural Resources Department	Pending
New Mexico Energy, Minerals and Natural Resources Department, Forestry Division	Pending
New Mexico Energy, Minerals and Natural Resources Department, Mining & Minerals Division	Pending
New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division	Pending
New Mexico Energy, Minerals and Natural Resources Department, Parks Division	Pending
New Mexico Environment Department	Pending
New Mexico Office of the State Engineer	Pending
New Mexico State Land Office, Surface Resources Division	Pending
New Mexico State Parks, Navajo Lake State Park	Pending
Ojo Encino Chapter House	Pending
Pueblo of Acoma	Pending
Pueblo of Cochiti	Pending

**Table I-4
Cooperating Agency Participation**

Agency/Tribe Invited to be a Cooperating Agency	Status
Pueblo of Isleta	Pending
Pueblo of Jemez	Pending
Pueblo of Laguna	Pending
Pueblo of San Felipe	Pending
Pueblo of Sandia	Pending
Pueblo of Santa Ana	Pending
Pueblo of Zia	Pending
Rio Arriba County	Pending
San Juan County	Pending
Sandoval County	Pending
Southern Ute Indian Tribe	Pending
US Army Corps of Engineers, Durango Regulatory Office	Pending
US Department of Agriculture, Rural Utilities Services	Pending
US Department of the Interior, Bureau of Indian Affairs, Division of Real Estate Services	Pending
US Department of the Interior, Bureau of Indian Affairs, Navajo Region, Shiprock Agency	Pending
US Department of the Interior, Bureau of Indian Affairs, Southwest Region	Pending
US Department of the Interior, Bureau of Indian Affairs, Southwest Region, Jicarilla Agency	Pending
US Department of the Interior, Bureau of Indian Affairs, Southwest Region, Southern Pueblos Agency	Pending
US Department of the Interior, Bureau of Indian Affairs, Southwest Region, Southern Ute Agency	Pending
US Department of the Interior, Fish and Wildlife Service	Pending
US Department of the Interior, Geological Survey, New Mexico Water Science Center	Pending
US Department of the Interior, National Park Service, Aztec Ruins National Monument	Pending
Ute Mountain Ute Tribe	Pending
Village of Cuba	Pending
Western Area Power Association	Pending

The BIA and BLM will engage these agencies throughout the planning process, including participation in alternatives development and reviewing and commenting on draft sections of this draft RMPA/draft EIS.

I.7 COLLABORATION AND CONSULTATION WITH TRIBES

The BIA and BLM have initiated consultation with Tribes that are identified as having cultural affiliation with, or traditional cultural properties and interests in, the planning area. The BLM has primary responsibility for this RMPA/EIS to conduct the consultation required by the National Historic Preservation Act and the American Indian Religious Freedom Act. The identified Tribes are the Hopi Tribe, Jicarilla Apache Tribe, Navajo Nation, Southern Ute Indian Tribe,

Ute Mountain Ute Tribe, Pueblo of Acoma, Pueblo of Cochiti, Pueblo of Isleta, Pueblo of Jemez, Kewa Pueblo, Pueblo of Laguna, Pueblo of Nambé, Ohkay Owingeh Pueblo, Picuris Pueblo, Pueblo of Pojoaque, Pueblo of Sandia, Pueblo of San Felipe, Pueblo de San Ildefonso, Pueblo of Santa Ana, Santa Clara Pueblo, Taos Pueblo, Pueblo of Tesuque, Pueblo of Zia, and Zuni Pueblo. The Navajo Nation National Council, Navajo Nation Counselor Chapter, Navajo Nation Ojo Encino Chapter, Navajo Nation Nageezi Chapter, Hopi Tribe, and Pueblo of Acoma each submitted scoping letters, and their comments are considered in this report.

In April 2014, the BLM held outreach meetings with the Hopi Tribe and Navajo Nation. The purpose of these meetings was to provide information to the Tribal governments and members on the RMPA and NEPA processes. The BLM held meetings with Navajo Tribal members at the Nageezi, Huerfano, Counselor, and Ojo Encino Chapter Houses to collect comments. Additionally, the BLM met with the Navajo Nation Tribal government in Window Rock. The purposes of this meeting were to provide information on the plan amendment and NEPA process and to listen to members concerns with and questions about the project.

The BLM also met with the Hopi Tribe in Kykotsmovi, Arizona. During this meeting, the BLM provided information about the RMPA and EIS and recorded the Tribe's concerns and questions for consideration during EIS development.

In 2016 and 2017, the BLM participated in 18 additional meetings with various Tribes and subdivisions, including representatives from the Nageezi, Ojo Encino, Counselor, and Terreon Chapters of the Navajo Nation; the Navajo Nation Historic Preservation Department; the Ohkay Owingeh Pueblo; the Pueblo of Acoma; the Pueblo of Laguna; and the Pueblo of San Felipe. The BIA also attended many of these meetings. The BLM also attended meetings of the Ten Southern Pueblo Governor's Council and All Pueblo Council of Governors in June and December 2016, respectively. Government-to-government consultation and coordination will be ongoing throughout the RMPA/EIS process to ensure that the concerns of Tribal groups are considered.

CHAPTER 2

COMMENT SUMMARY

2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions received or postmarked on or before February 26, 2017, were evaluated and are documented in this scoping report.

The BIA and BLM received a total of 1,694 unique written submissions during the public scoping period. Numerous organizations coordinated letter campaigns; the number of submissions received from each form letter campaign are as follows:

- Archaeology Southwest—4 submissions
- Frack Off Greater Chaco—393 submissions
- San Juan Citizens Alliance—462 submissions
- Sierra Club, Rio Grande Chapter—7,833 submissions
- WildEarth Guardians—6,422 submissions

A representative letter from each campaign was entered into the comment-tracking database and was included in the total number of unique submissions. Letters that presented slight variations of the form letter, without significant additional information, were treated as form letters. When substantive comments were added to the form letter, they were treated as unique and were entered into the comment-tracking database. The most common format used for submissions was email. Submissions were also hand-delivered to the FFO and NRO, sent via US Postal Service mail, faxed, handed in at public scoping meetings, or spoken and recorded at public meetings.

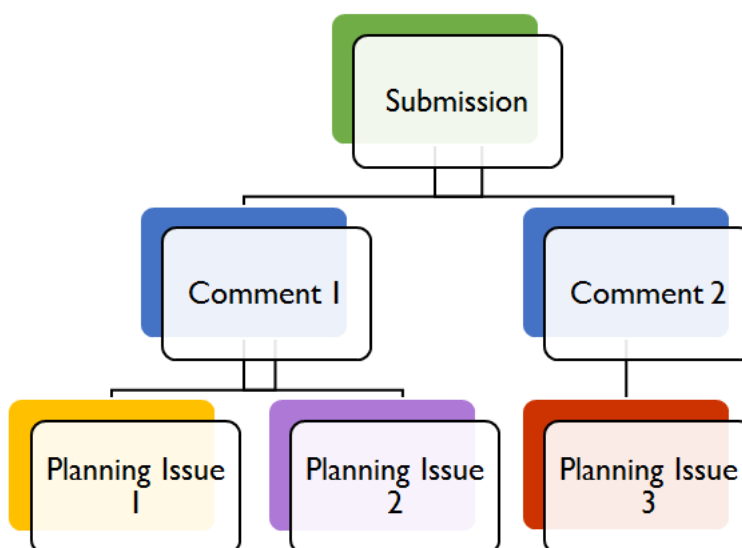
Appendix A is a list of commenters and their affiliations.

The comment forms provided instructions for requesting confidentiality and for withholding individual names or addresses from public review or from

disclosure under the Freedom of Information Act. Twelve submissions were from those wishing to remain anonymous. A summary of commenter affiliation and geographic location is in **Section 2.2.1, Submissions by Affiliation**, and **Section 2.2.2, Commenters by Geographic Area**.

To ensure that public comments were properly registered and that none were overlooked, the BIA and BLM used a multiphase management and tracking system. First, they logged and numbered written submissions. Most written submissions included more than one comment, so the 1,694 submissions yielded 3,736 discrete comments. To assist with the analysis, the BIA and BLM entered all substantive comments from each submission into the BLM's ePlanning CommentWorks comment database. This allowed the agencies to electronically organize comments by planning issue categories and commenter affiliation. Some comments were categorized under more than one planning issue, which resulted in a total of 4,073 comments. **Figure 2-1, Scoping Submission Comment Analysis**, outlines how unique submissions are parsed into comments and comments are then categorized by planning issue.

Figure 2-1
Scoping Submission Comment Analysis



Once all submissions were received and documented, the BIA and BLM assigned each comment to one of the following process categories:

- Comments related to an issue that will be addressed in the RMPA/EIS process (including general comments on the planning process and comments on specific resource issues)
- Comments that will not be addressed in the RMPA/EIS process
 - Implementation issues

- Issues addressed in other planning efforts
- Issues beyond the scope of this RMPA/EIS

Finally, the BIA and BLM queried and tallied these identifiers to provide information on planning and other issue categories. Details for each of these process categories are included in **Section 2.2.3**, Number of Comments by Process Category, below.

2.2 SUMMARY OF PUBLIC COMMENTS

2.2.1 Written Submissions by Affiliation

Table 2-1 and **Figure 2-2**, Submissions by Affiliation, show the number and proportion of submissions received from each type of affiliation. Commenters who submitted comments on business, agency, or organization letterhead or who signed using their official agency title were considered to represent that organization. Submissions on the BIA and BLM comment form provided at the scoping meetings and on the project website were assigned the affiliation that commenters noted on the form. All other submissions were considered to represent individuals.

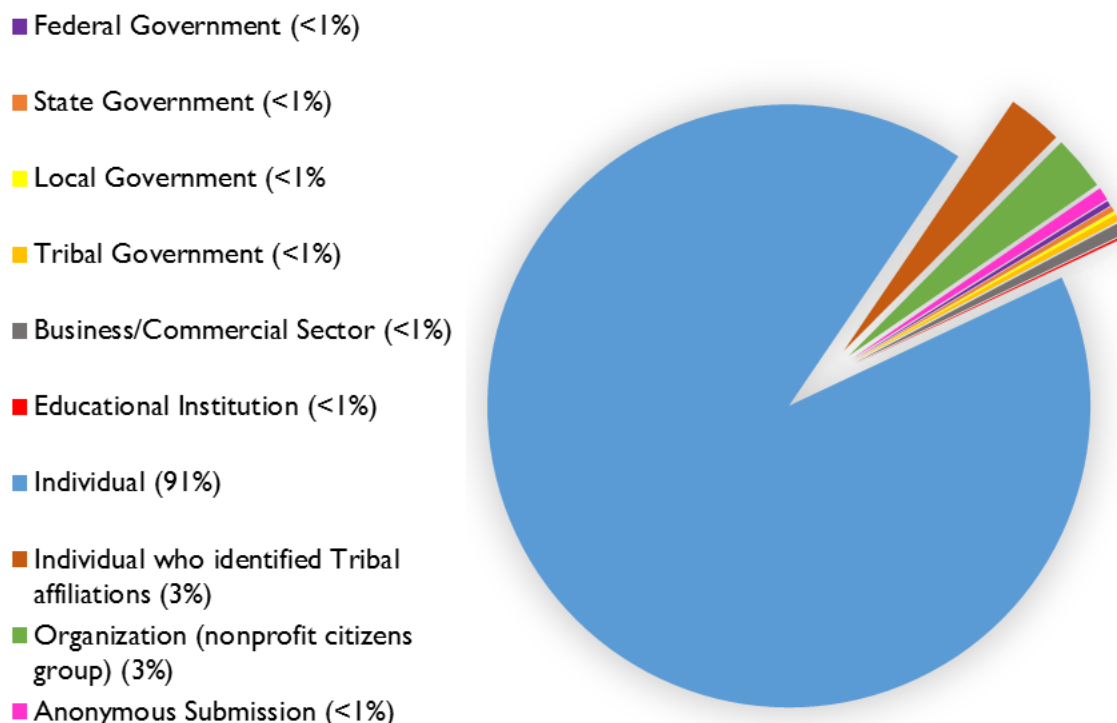
Federal agencies provided 5 written submissions (less than 1 percent of all submissions), state agencies provided 5 (less than 1 percent of all submissions), and local government agencies provided 3 (less than 1 percent of all submissions).

Table 2-1
Submissions by Affiliation

Affiliation	Number of Submissions	Percent of Submissions
Government Agency		
Federal	5	<1%
State	5	<1%
Local	3	<1%
Tribal Government	6	<1%
Business/Commercial Sector	11	<1%
Educational Institution	2	<1%
Individual	1,550	91%
Individuals who identified Tribal affiliations	50	3%
Organization (nonprofit citizens group)	50	3%
Anonymous Submission	12	<1%
Total¹	1,694	100%

¹ The number of submissions shown here is less than the number of comments, because each submission may contain more than one discrete comment.

Figure 2-2
Submissions by Affiliation



Most comment letters (91 percent) received during the scoping period came from individual members of the general public. Nonprofit or citizen groups submitted 3 percent, individuals with identified Tribal affiliations submitted 3 percent, Tribal governments submitted less than 1 percent, representatives from businesses submitted less than 1 percent, and educational institutions submitted less than 1 percent. The BIA and BLM also received twelve anonymous submissions, accounting for less than 1 percent of submissions. **Appendix A** is a full list of commenters and their affiliations.

2.2.2 Commenters by Geographic Area

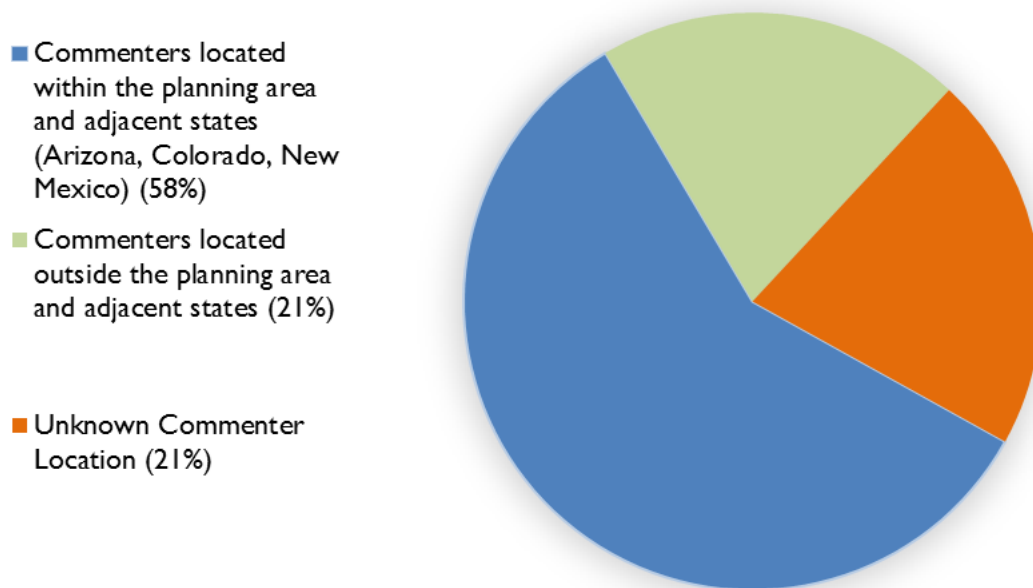
Table 2-2 and Figure 2-3, Commenters by Geographic Area, show the number and proportion of commenters and their geographic location. A total of 998 commenters (58 percent) were from within the planning area or adjacent states (Arizona, Colorado, and New Mexico). Of the remaining commenters, 349 (20 percent) were from communities outside of the planning area and adjacent states, and 361 (21 percent) did not indicate a geographic location. Many submissions had multiple signatories, which is why there are more commenters than submissions.

Table 2-2
Commenters by Geographic Area

Location	Number of Commenters	Percent of Commenters
Within planning area and adjacent states (Arizona, Colorado, and New Mexico)	998	58%
Outside planning area and adjacent states	349	20%
Unknown	361	21%
Total¹	1,708	100%

¹The number of commenters shown here is greater than the number of submissions, because some submissions have multiple signatories.

Figure 2-3
Commenters by Geographic Area



2.2.3 Number of Comments by Process Category

Table 2-3 and **Figure 2-4**, Comments by Process Category, show the number of comments received in the submissions and the number of comments that were assigned to each process category. Two broad categories of comments were defined, as follows:

- Issues to be addressed in the RMPA/EIS
 - Comments related to specific resource topics and those related to the planning process
 - Consistency with other plans
 - Cooperating agencies
 - Consultation requirements
 - Agency laws, regulations, or policy
- Issues that will not be addressed in this RMPA/EIS process
 - Implementation actions: site-specific actions that carry out decisions made in the ROD and authorize specific activities; all implementation actions must be in conformance with or allowed by the land use plan decisions
 - Issues covered in other planning efforts
 - Out-of-scope comments: comments that are substantive but apply to areas outside the decision area or apply to decisions that are not part of this RMPA/EIS

Table 2-3
Comments by Process Category

Process Category	Number of Comments	Percent of Comments
Issues to be addressed during this RMPA/EIS	4,045	99%
Comments related to a specific resource topic (Sections 1-30, 39-41, 43-46)	3,563	87%
<i>Primary Resource Issues (Oil and Gas, Lands and Realty, Lands with Wilderness Characteristics, and Vegetation; Sections 1-6, 26, 29, 41, 43, 44)</i>	1,271	31%
<i>Other Resource Issues (Sections 7-25, 27-28, 30, 39, 40, 45-46)</i>	2,292	56%
Planning criteria (Section 31)	38	1%
General comments related to the RMPA/EIS (Section 32)	156	4%
Scoping (Section 33)	94	2%
Consistency with Tribal, state, and local policy and plans (Section 34)	10	<1%
Cooperating agencies (Section 35)	4	<1%
Consultation requirements (Section 36)	158	4%
Issues related to BIA and BLM laws, regulations, or policy (Section 37)	22	1%

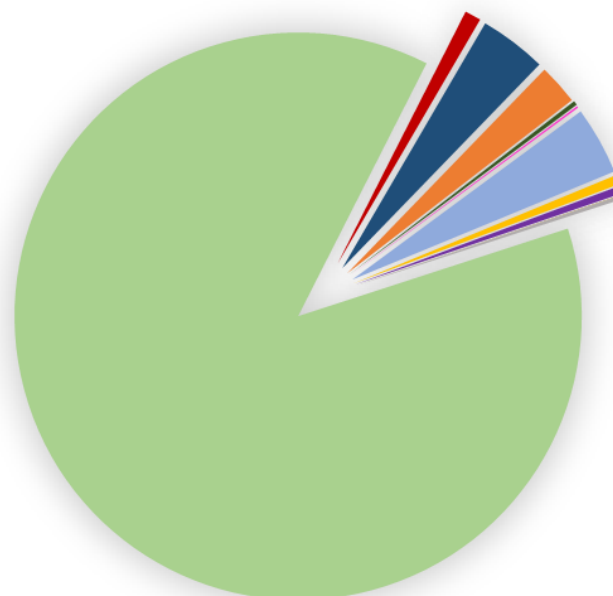
Table 2-3
Comments by Process Category

Process Category	Number of Comments	Percent of Comments
Issues that will not be addressed in the RMPA/EIS	28	1%
Implementation actions (Piñon Pipeline and improvements to future lease sales; Section 42)	18	<1%
Issues previously covered by other planning efforts (ACECs; Section 38)	1	<1%
Beyond scope (Dakota Access Pipeline and Standing Rock; Section 49)	9	<1%
Total	4,073	100%

Note: Section numbers above reference relevant section for comments and comment summaries in **Appendix B**. The number of comments by Process Category/Issue (4,073) exceeds the total number of discrete comments (3,736), because some comments were considered under more than one planning issue.

Figure 2-4
Comments by Process Category

- Comments related to a specific resource topic (87%)
- Planning Criteria (1%)
- General comments related to the RMPA/EIS (4%)
- Comments concerning the scoping process (2%)
- Consistency with Tribal, state, and local policy and plans (<1%)
- Cooperating agencies (<1%)
- Consultation requirements (4%)
- Issues related to BIA and BLM laws, regulations, or policy (1%)
- Implementation actions (<1%)
- Issues previously covered by other planning efforts (<1%)
- Comments beyond the scope of the planning effort (<1%)



See **Appendix B** for comments in each process category. Relevant sections of the comment report are shown in **Table 2-3**, above, for cross-reference.

Of the 4,073 comments analyzed, 4,045 (99 percent) concerned planning issues that the BIA and BLM will address in the RMPA/EIS. Such comments related to the planning process for this project, general comments on the RMPA/EIS, and comments related to specific resource topics. While some commenters addressed multiple planning issues, the BIA and BLM assigned most comments to one primary resource category for analysis. Comments related to resource topics are discussed in detail below under **Section 2.2.3.1, Comments Related to a Resource Topic for Analysis**.

The remaining 1 percent of the comments concerned issues that will not be directly addressed in the RMPA/EIS. Such issues are those that the BIA and BLM have addressed in other planning efforts (less than 1 percent of total comments), those related to implementation-level decisions (less than 1 percent), or those beyond the scope of the RMPA/EIS (less than 1 percent).

See **Section 2.4, Issues That Will Not Be Addressed in the RMPA/EIS**, for more detail; see **Appendix B** for comments and summaries for each issue category.

2.2.3.1 Comments Related to a Resource Topic for Analysis

The BIA and BLM further categorized comments on issues to be addressed during this RMPA/EIS by resource topic for analysis; they received 3,563 such comments. These comments related to primary resource categories for which management decisions will be made (1,271 total comments on oil and gas, lands and realty, lands with wilderness characteristics, and vegetation), as well as other resources and resource uses that may be impacted by the BLM's and BIA's proposed management actions (2,292 total comments).

Table 2-4 and **Figure 2-5, Comments by Resource Category**, show the number and proportion of comments received by resource category. Approximately 36 percent of comments related to specific issues were received on the primary resource categories; the remaining 64 percent were related to other resource and resource use issues. Oil and gas development, including sub-issues, received 29 percent of the resource issue comments. The single resource issue with the largest number of comments (16 percent of resource issue comments) was Chaco cultural landscape, and water resources received another 6 percent of the planning issue comments. Public health and safety, including sub-issues, (8 percent); cultural resources (5 percent); socioeconomics, including sub-issues (5 percent); air resources (5 percent); and climate change (4 percent) were also resource issues receiving a high number of comments. **Table 2-4** includes cross-references to section numbers in **Appendix B**.

Table 2-4
Comments by Resource Category¹

Resource Issue	Number of Comments	Percent of Planning Issue Comments
PRIMARY RESOURCE ISSUES		
Oil and Gas Development		
Goals and Objectives (Section 1.1)	77	2%
Allocations and Management Actions (Section 1.2)	126	4%
Baseline Data (Section 1.3)	23	1%
Hydraulic Fracturing (Section 1.4)	325	9%
Mitigation Measures (Section 1.5)	57	2%
Master Leasing Plans (Section 26)	27	1%
Split Estate (Section 29)	2	<1%
General Leasing (Section 41)	347	10%
Tribal leasing decisions (Section 43)	42	1%
Allotted leasing decisions (Section 44)	22	1%
<i>Issue total</i>	1,050	29%
Lands and Realty Actions		
Goals and Objectives (Section 2.1)	23	1%
Allocations and Management Actions (Section 2.2)	167	5%
Land Tenure Adjustments (Section 2.3)	2	<1%
Impact Analysis Considerations (Section 2.4)	4	<1%
<i>Issue total</i>	196	6%
Lands with Wilderness Characteristics (Section 3)	8	<1%
Vegetation Management- Wildlife (Section 4)	12	<1%
Vegetation Management- Uplands and Riparian (Section 5)	5	<1%
Vegetation Management- Noxious Weeds Invasive Species (Section 6)	0	NA
OTHER RESOURCE ISSUES		
Air Resources (Section 7)	189	5%
Climate Change (Section 8)	160	4%
Noise (Section 9)	23	1%
Recreation/Night Sky (Section 10)	34	1%
Cultural Resources (Section 11)	169	5%
Paleontological Resources (Section 12)	0	NA
Soil Resources (Section 13)	9	<1%
Water Resources (Section 14)	197	6%
Socioeconomics		
Goals and Objectives (Section 15.1)	14	<1%
Allocations and Management Actions (Section 15.2)	4	<1%
Baseline Data (Section 15.3)	25	1%
Impact Analysis Considerations (Section 15.4)	127	4%
Mitigation Measures (Section 15.5)	1	<1%
<i>Issue Total</i>	171	5%

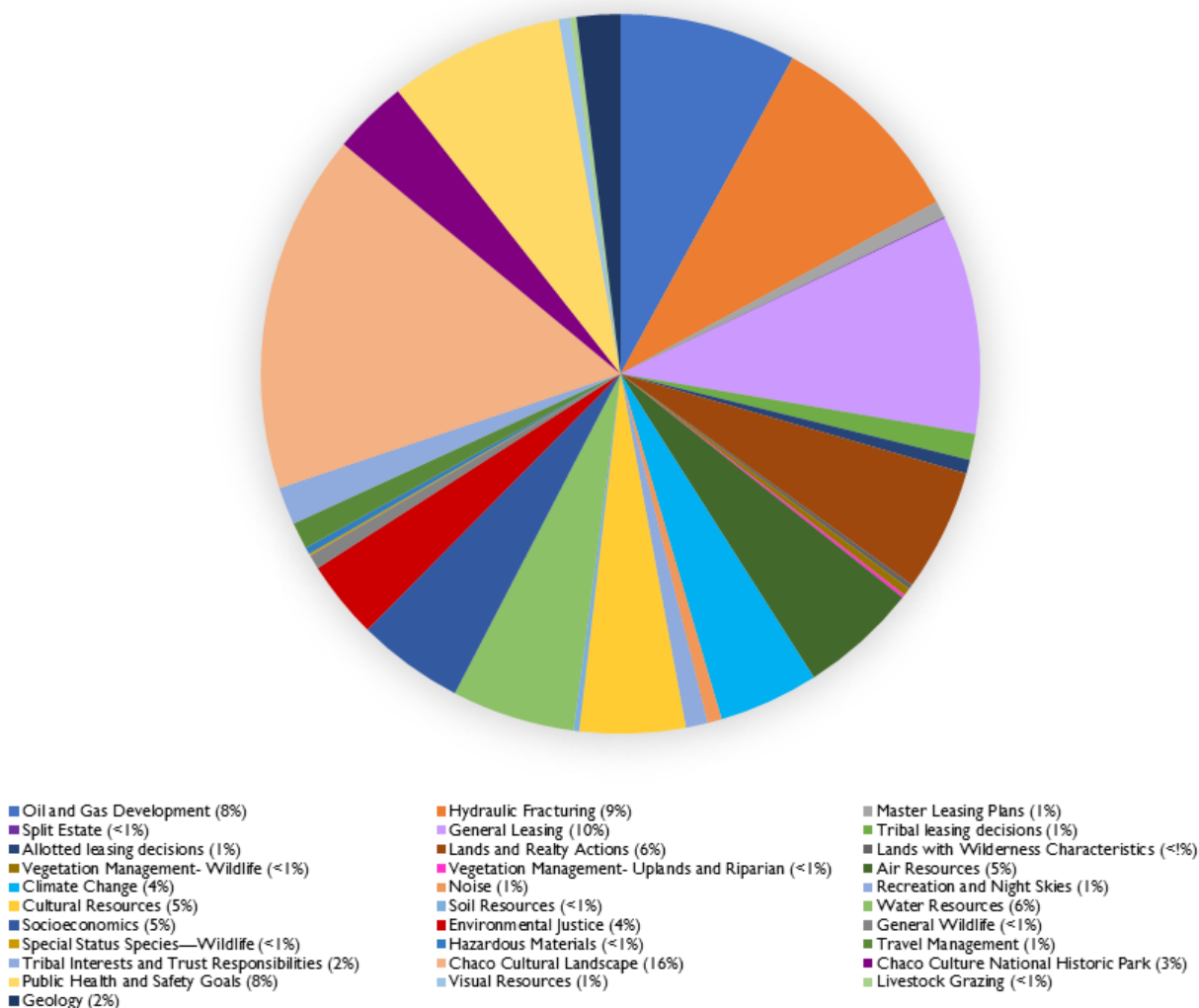
Table 2-4
Comments by Resource Category¹

Resource Issue	Number of Comments	Percent of Planning Issue Comments
Environmental Justice		
Goals and Objectives (Section 16.1)	28	1%
Allocations and Management Actions (Section 16.2)	9	<1%
Baseline Data (Section 16.3)	12	<1%
Impact Analysis Considerations (Section 16.4)	75	2%
Mitigation Measures (Section 16.5)	1	<1%
Issue Total	125	4%
General Wildlife (Section 17)	23	1%
Special Status Species—Wildlife (Section 18)	3	<1%
Special Status Species—Plants (Section 19)	0	NA
Migratory Birds (Section 20)	0	NA
Hazardous Materials (Section 21)	11	<1%
Travel Management (Section 22)	43	1%
Salable Minerals (Section 23)	0	NA
National Historic Trails (Section 24)	0	NA
Tribal Interests and Trust Responsibilities		
Goals and Objectives (Section 25.1)	23	1%
Allocations and Management Actions (Section 25.2)	6	<1%
Baseline Data (Section 25.3)	9	<1%
Impact Analysis Considerations (Section 25.4)	22	1%
Mitigation Measures (Section 25.5)	0	NA
Issue Total	60	2%
Chaco Cultural Landscape (Section 27)	576	16%
Chaco Culture National Historic Park (Section 28)	120	3%
Public Health and Safety		
Goals and Objectives (Section 30.1)	14	<1%
Allocations and Management Actions (Section 30.2)	10	<1%
Baseline Data (Section 30.3)	55	2%
Impact Analysis Considerations (Section 30.4)	200	6%
Mitigation Measures (Section 30.5)	1	<1%
Issue Total	280	8%
Visual Resources (Section 39)	18	1%
Recreation (Section 40)	0	NA
Livestock Grazing (Section 45)	10	<1%
Geology (Section 46)	70	2%
Total²	3,563	100%

¹ Section numbers above reference relevant section for comments and comment summaries in **Appendix B**.

² The number of comments shown here is greater than the number of submissions, because each submission may contain more than one discrete comment.

Figure 2-5
Comments by Resource Category



See **Appendix B** for individual comments in each resource issue category and summaries of the information received in public scoping comments by subcategory.

2.3 ISSUES THAT WILL BE ADDRESSED IN THE RMPA/EIS

As defined in the BLM Land Use Planning Handbook, H-1601-1 (BLM 2005), planning issues are disputes or controversies about existing and potential land and resource allocations, levels of resource use, production, and related management practices. Planning issues provide the major focus for alternatives development. Planning issues related to the primary resource issues will be directly addressed in alternatives development; however, planning issues related to other resources will be used to develop appropriate measures to minimize impacts from oil and gas development on these resources and resource uses. The BLM identified a set of planning issues during internal scoping and initial

scoping in 2014. The issues listed below are those identified during this additional scoping process.

2.3.1 Issues Identified in Additional Scoping

In addition to submitting general comments on the planning process, commenters identified a range of other issues that would be affected by decisions on BIA mineral leasing and associated activities.

Commenters requested that the following issues be considered in the EIS analysis (section references refer to sections of **Appendix B**, where comment excerpts and summaries covered by each issue statement can be found):

- Issue 1—Oil and Gas Development
 - How would the BLM and BIA manage fluid mineral leasing, including level of allowed development, stipulations, and mitigation measures, to fulfill the BLM and BIA’s individual missions, while addressing impacts on other resources, given the predicted increase in development and the use of hydraulic fracturing technology? How would the BLM and BIA manage these same activities to fulfill their missions, while addressing impacts on other resources? (Sections, 1.1, 1.2, 1.4, 1.5, 41, and 43)
 - What baseline data, reports, or studies would the BLM and BIA use to manage fluid mineral development? (Section 1.3)
 - How would the BLM and BIA use a master leasing plan to minimize impacts from oil and gas development? (Section 26)
 - How should the BLM and BIA address split-estate parcels? (Section 29)
 - How would the BIA and BLM manage leasing and development on allotted lands? (Section 44)
- Issue 2—Lands and Realty
 - How would the BLM and BIA revise right-of-way management to allow for renewable energy development? (Section 2)
- Issue 3—Lands with Wilderness Characteristics
 - How would the BLM assess and manage lands with wilderness characteristics in the planning area? (Section 3)
- Issue 4—Vegetation Management
 - How would the BLM and BIA mitigate development impacts on vegetation, given its importance to wildlife and traditional uses? (Section 4)

- How would the BLM and BIA mitigate impacts on upland and riparian areas, while balancing traditional uses of the land? (Section 5)
- Other Resource Issues
 - How would the BLM and BIA accurately assess current air quality conditions and determine appropriate mitigation measures to minimize potential impacts on air quality from proposed fluid mineral development? (Section 7)
 - How would the BLM and BIA address the effects of oil and gas development on greenhouse gas emissions and climate change? (Section 8)
 - How would the BLM and BIA mitigate noise impacts from oil and gas development, particularly near sensitive sites, such as the Chaco Culture National Historic Park? (Section 9)
 - How would the BLM and BIA mitigate impacts on night skies and recreation from oil and gas development, particularly near sensitive sites, such as the Chaco Culture National Historic Park? (Section 10)
 - How would the BLM and BIA minimize the impacts of oil and gas development on important cultural resources in the planning area? (Section 11)
 - How would the BLM and BIA minimize erosion and contamination impacts from oil and gas development on soil resources? (Section 13)
 - How would the BLM and BIA assess current water quality and minimize impacts on groundwater and surface water quality and quantity from oil and gas development, including hydraulic fracturing? (Section 14)
 - How would the BLM and BIA address both positive and negative impacts of oil and gas development on local and regional economies and social setting, including nonmarket values? What baseline data, reports, and studies would the BLM and BIA use to address socioeconomic issues? (Section 15)
 - How would the BLM and BIA minimize and mitigate disproportionate and adverse environmental justice impacts from oil and gas development? What baseline data, reports, and studies would the BLM and BIA use to address environmental justice issues? (Section 16)

- How would the BLM and BIA minimize impacts of oil and gas development on wildlife habitat, such as fragmentation and contamination? (Section 17)
- How would the BLM and BIA minimize impacts of oil and gas development on special status species? (Section 18)
- How would the BLM and BIA minimize impacts from hazardous materials during oil and gas development? (Section 21)
- How would the BLM and BIA minimize impacts from increased vehicular traffic and additional roads in the planning area, because of oil and gas development? (Section 22)
- How should the BLM and BIA incorporate and minimize impacts on Tribal interests and address Tribal trust responsibilities? What baseline data, reports, and studies should the BLM and BIA use to incorporate Tribal interests and address Tribal trust responsibilities? (Section 25)
- How would the BLM and BIA minimize oil and gas development impacts on the Chaco cultural landscape? (Section 27)
- How would the BLM and BIA ensure preservation of the Chaco Culture National Historic Park from impacts of oil and gas development? (Section 28)
- How would the BLM and BIA minimize and mitigate impacts from the oil and gas industry on human health? What measures would be put in place to ensure transparency of information related to potential hazards and contaminants in the planning area? What baseline data, reports, or studies would the BLM and BIA use to minimize impacts from the oil and gas industry on human health? (Section 30)
- How would the BLM and BIA minimize impacts on visual resources from oil and gas development? (Section 39)
- How would the BLM and BIA minimize potential impacts on livestock grazing from oil and gas development? (Section 45)
- How would the BLM and BIA minimize potential impacts on geologic resources and seismic activity from oil and gas development? (Section 46)

2.3.2 New In-Scope Issues from 2014 Scoping

During this second scoping period, the BIA and BLM revisited the comments submitted during the 2014 scoping period. Some comments were considered outside the scope of the planning effort at that time because they were related

to BIA authority over mineral leasing and associated activities. These comments are summarized below and will be considered along with other comments submitted during the scoping periods. See Section 51 of **Appendix B** for specific comments.

The BLM and BIA should consider the following regarding cultural resources during the planning process:

- Protections for the cultural resources in the area, including augmenting Section 106 studies with Section 110 studies
- Consideration of the Chaco Site Protection System as special designated lands and as a landscape scale responsibility
- Protections for the Lybrook and other badland areas

The BLM and BIA should also take into consideration the leasing process, including the following:

- No new leases until the lessee has accepted a right-of-way plan for a pipeline route
- Consideration of the entire length of a proposed pipeline at one time, not on a site-by-site basis
- Consideration of the use of existing development and direct paths over Navajo land for pipelines, to minimize disturbance
- The continuation of processing permits, sundry notices, and related authorizations on existing leases

It is important to consider livestock authorizations and consultation with grazing permit holders.

2.4 ISSUES THAT WILL NOT BE ADDRESSED IN THE RMPA/EIS

As discussed in **Section 2.2.3**, Number of Comments by Process Category, approximately one percent of the comments (28 comments) concerned issues that will not be addressed in this EIS. These include issues that the BIA has already addressed or will address independently of the EIS and issues beyond the scope of the EIS. See **Appendix B** for specific comments and comment summaries by category.

2.4.1 Issues Related to Implementation

Implementation issues that the BLM has addressed or will address outside of the RMPA process include decisions that require on-the-ground action following the RMPA decisions. Comments about implementation issues included specifics of future lease sales and comments on specific projects outside the scope of this RMPA/EIS, such as the Piñon Pipeline Project. Individual comments and summaries are in **Appendix B**, Section 42.

2.4.2 Issues Addressed in Other Planning Documents

Commenters suggested greater protection using an area of critical environmental concern (ACEC) designation for areas with significant value, including cultural resources, and expanding ACECs in general. These issues will not be addressed in the current planning effort, because they were addressed in the February 2014 Greater Chaco Landscape ACEC Evaluation. Individual comments and a full summary are in **Appendix B**, Section 38.

2.4.3 Issues beyond the Scope of This RMPA/EIS

Comments related to issues outside the scope of the RMPA/EIS were those concerning land management on areas outside the planning area, such as the Dakota Access Pipeline Project. Individual comments and a full summary are in **Appendix B**, Section 49.

CHAPTER 3

PLANNING CRITERIA

During its initial planning sessions and internal scoping, FFO staff developed preliminary planning criteria, which were published in the NOI on February 25, 2014. Planning criteria establish constraints, guidelines, and standards for the planning process. They also help planners define the scope of the amendment process and estimate the extent of data collection and analysis.

Planning criteria are based standards prescribed by the following:

- Applicable laws and regulations
- Agency guidance
- Results of consultation and coordination with the public and other federal, state, and local agencies
- Analysis of information pertinent to the planning area
- Professional judgment

The BLM and BIA may change planning criteria as a result of public input, as issues are addressed, or as new information is presented.

3.1 ORIGINAL PLANNING CRITERIA

The following preliminary planning criteria were presented in the February 25, 2014 NOI for public comment:

- The BLM will prepare the RMPA in compliance with the FLPMA, the Endangered Species Act, the Clean Water Act, the Clean Air Act, the National Environmental Policy Act of 1969, and all other applicable laws, Executive Orders, and BLM management policies.
- The BLM will use the EIS as the analytical basis for any decision it makes to amend the RMP.

- The BLM is developing a reasonably foreseeable development scenario to predict future levels of development.
- Lands covered in the RMPA/EIS will be public land and split estate minerals managed by the BLM.
- No decisions will be made relative to non-BLM-managed lands or minerals.
- The BLM will recognize valid existing rights under the RMP, as amended.
- The BLM will coordinate with federal, state, and local agencies and Tribal governments in the RMPA/EIS process to achieve consistency with existing plans and policies, to the extent practicable.
- The BLM will coordinate with Tribal governments and provide strategies for the protection of recognized traditional uses in the RMPA/EIS process.
- The RMPA/EIS will recognize the State's responsibility and authority to manage wildlife. The BLM will consult with the New Mexico Department of Game and Fish.
- The BLM will consider appropriate protection and management of cultural and historic resources in the RMPA/EIS process and will engage in all required consultation.
- The BLM will recognize in the RMPA/EIS the special importance of public lands to people who live in communities surrounded by public lands and the importance of public lands to the nation as a whole.
- The BLM will make every effort to encourage public participation throughout the RMPA/EIS process.
- The BLM has the authority to develop protective management prescriptions for lands with wilderness characteristics within RMPs. As part of the public involvement process for land use planning, the BLM will consider public input regarding lands to be managed to maintain wilderness characteristics.
- Environmental protection and energy production are both desirable and necessary objectives of sound land management practices and are not to be considered mutually exclusive priorities.
- Broad-based public participation will be an integral part of the RMPA/EIS process. Decisions in the plan will strive to be compatible with the existing plans and policies of adjacent federal, Tribal, state, and local agencies, as long as the decisions are consistent with the purposes, policies, and programs of federal law and regulations applicable to public lands.

- The BLM will strive to minimize potential adverse environmental impacts.
- The BLM will strive to minimize potential adverse social and economic impacts.
- The BLM will facilitate oil and gas development and production and provide options for flexibility to the oil and gas industry for environmentally sound exploration, development, and operations.
- The BLM will update management actions that are no longer adequate to address unforeseen impacts of additional oil and gas development within the Mancos/Gallup formations that are not accounted for in the current RMP.
- The RMPA/EIS will incorporate management decisions brought forward from existing BLM planning documents.

No comments related to the preliminary planning criteria were received during the 2014 public scoping period.

3.2 ADDITIONAL PLANNING CRITERIA

The following preliminary planning criteria were presented in the October 21, 2016 NOI for public comment:

- The BIA will serve as co-lead agency for this EIS.
- The BLM and BIA will prepare the RMPA/EIS in compliance with FLPMA, the Endangered Species Act, the Clean Water Act, the Clean Air Act, NEPA, and all other applicable laws, executive orders, and BLM and BIA management policies.
- The BIA will use the EIS as the analytical basis for decisions pertaining to the leasing of Tribal trust and individual Indian allotted minerals within the planning area.
- The BIA will use this EIS to inform decisions on lands where mineral leasing and associated activities are managed by the BIA.
- The BLM and BIA will recognize valid existing rights.
- The BLM and BIA will coordinate with federal, Tribal, and state governments and local agencies in the RMPA/EIS process to ensure consistency with existing plans and policies, to the extent practicable.
- The BLM and BIA will consult with Indian Tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies.
- The BLM and BIA will coordinate with Tribal governments and provide strategies for the protection of recognized traditional uses and sacred sites.

- The BLM and BIA will apply appropriate protection and management of cultural resources and historic properties, and will engage in all required Tribal consultations.
- The BLM and BIA will consult with the New Mexico Department of Game and Fish and the Navajo Nation Department of Fish and Wildlife as appropriate.

CHAPTER 4

DATA SUMMARY/DATA GAPS

4.1 SUMMARY OF AVAILABLE RELEVANT INFORMATION

The BLM and BIA will use both new data and existing resource information to formulate management alternatives in the RMPA/EIS. To facilitate this process, the BLM and BIA are compiling digital GIS datasets for use in analysis and map production. Because this information is necessary to quantify resources, update maps, and manipulate information when formulating alternatives, this process must be completed before actual analysis can begin. The BLM and BIA will use the new data generated during the RMPA/EIS process to address planning issues; these data will meet applicable established standards.

4.2 PLANS AND DOCUMENTS

Other Federal Plans and Guidance

- Aztec Ruins National Monument General Management Plan (National Park Service 2010)
- BLM Healthy Lands Initiative
- BLM Handbook H-1601-1: Land Use Planning (BLM 2005)
- BLM Handbook H-1740-2: Integrated Vegetation Management (BLM 2008a)
- BLM Handbook H-1790-1: NEPA Handbook (BLM 2008b)
- BLM Manual 6310: Conducting Wilderness Characteristics Inventories on BLM Lands (BLM 2012a)
- BLM Manual 6320: Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process (BLM 2012b)
- Chaco Culture National Historic Park General Management Plan (National Park Service 1985)
- Farmington Field Office Resource Management Plan (BLM 2003)

- Farmington Field Office Visual Resource Management Resource Management Plan Amendment (BLM 2014b)
- Indian Affairs Manual, I IAM-H, Indian Affairs Directives Handbook (BIA 2014)
- Indian Affairs Manual, 59 IAM 3-H.59, Indian Affairs National Environmental Policy Act (NEPA) Guidebook (BIA 2012)
- Old Spanish National Historic Trail Comprehensive Management Plan/EIS (National Park Service, in progress)

State Plans

- New Mexico Comprehensive Wildlife Conservation Strategy (New Mexico Department of Game and Fish 2006)
- New Mexico State Parks, Navajo Lake Management Plans, Lakeside (NMSP 2012) and Riverside (NMSP 2014)
- New Mexico State Water Plan (New Mexico Office of the State Engineer/Interstate Stream Commission 2003)
- The New Mexico 2040 Plan New Mexico Department of Transportation's Long Range, Multi-Modal Transportation Plan (New Mexico Department of Transportation 2015)

Tribal and Local Government Plans

- Animas River Trails System Plan, 2010 (Aztec Trails and Open Space and City of Aztec 2010)
- Bloomfield Comprehensive Plan, 2007 (Northwest New Mexico Council of Governments 2007)
- City of Aztec Comprehensive Plan, 2002 (Sites Southwest 2002)
- City of Farmington Comprehensive Plan, 2002 (Wilbur Smith Associates et al. 2002)
- La Plata County Comprehensive Plan (Colorado), 2001 (County of La Plata 2001)
- McKinley County Comprehensive Plan, 2003 (County of McKinley 2003)
- Navajo Nation, Biological Resource Land Use Clearance Policy and Procedures (Navajo Nation 2008)
- Navajo Nation, Chapter House Community-Based Land Use Plans
- Comprehensive Plan County of Rio Arriba (County of Rio Arriba 2014)
- Sandoval County Comprehensive Plan, 2013 (County of Sandoval 2013)

- San Juan County Growth Management Plan Update (County of San Juan 2012)

Other Documents

- Biological Baseline Report
- Raptor Management Report
- Migratory Bird Report
- Analysis of the Management Situation
- Socioeconomic Baseline Report

4.2.1 Data

- Revised Reasonably Foreseeable Development Scenario for the Planning Area
- Hydrological Assessment
- Air Quality Modeling Analysis
- Lands with Wilderness Characteristics inventory
- BLM Colorado Plateau Rapid Eco-Regional Assessment
- Southwest Regional Gap Analysis Project (ReGAP) vegetation data
- Cobell Settlement Buy-Back Program lands data
- Navajo Nation roads data
- Navajo Nation Environmental Protection Agency data
- Public Water Systems Supervision Program
- Navajo Nation Tribal Utility Authority data

4.2.2 Additional Information Identified During Scoping

The BIA and BLM received suggestions during scoping about studies to review, information to analyze, documents to consider as guidance, descriptions of existing landscape conditions, and examples of related information. They will consider these suggestions during RMPA/EIS development and will use the best available data pertinent to the decisions to be made, knowledge of the planning area, and professional judgment. Comments pertaining to information for review are in **Appendix B**.

4.3 DATA GAPS

The BIA and BLM will gather data for the EIS throughout the RMPA/EIS process to ensure that data gaps are minimized. They will maintain different datasets that reflect their individual missions; for example, the BIA defers to the Navajo Nation to maintain certain GIS data for resources on Tribal lands. This allows the Tribe to ensure confidentiality for certain information and reflects the cooperative arrangement between the BIA and the Navajo Nation. Availability

of these datasets is dependent upon the Navajo Nation. In contrast, the BLM maintains its data internally for the lands and resources it manages.

CHAPTER 5

FUTURE STEPS

5.1 SUMMARY OF FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The next phase of the BIA and BLM planning process is to develop a range of alternatives, based on the issues presented in **Section 2.3**, Issues That Will be Addressed in the RMPA/EIS, and from the 2014 scoping issues. Alternatives development is guided by established planning criteria outlined in 43 CFR, Part 1610 (see **Chapter 3**, Planning Criteria). In compliance with NEPA, FLPMA, CEQ regulations, and BIA and BLM planning regulations and guidance, the BIA will review the existing BLM draft alternatives to assess their relevance. The BIA will adopt one or more of the alternatives, if applicable, and could develop new draft alternatives that address the identified planning issues. Any alternative considered will explore opportunities to enhance management of resources and resource uses, to resolve conflicts among resources and resource uses, and to meet the purpose of and need for the RMPA/EIS. Alternatives must be capable of implementation and must be feasible.

As part of alternatives development, the BLM and BIA will provide summary information on the alternatives to the public for review and comment. This is anticipated to occur in fall 2017. Public feedback will be used to revise and finalize the alternatives considered in the draft RMPA/EIS. In the draft RMPA/EIS, the BLM and BIA will document the analysis of the alternatives and will identify preferred alternatives for each agency. The agencies will distribute the draft document, anticipated to be published in fall 2018, to elected officials, regulatory agencies, and members of the public. They will also make the draft document available on the project website. They will announce the availability of the draft document via an NOA in the *Federal Register*. A 90-day public comment period will follow, during which the agencies will hold a series of public meetings in and near the planning area.

After the public comment period, the BLM and BIA will review and analyze public comments and will determine what changes need to be made to the

document. They will then revise the Draft RMPA/EIS and will prepare a Proposed RMPA/Final EIS, which will then be published. The BLM and BIA will announce the availability of the Proposed RMPA/Final EIS in the *Federal Register*, following which will be a 30-day protest period. Concurrently, the BLM and BIA will request that the New Mexico governor and the Navajo Nation president review the Proposed RMPA/Final EIS for consistency with approved state, Tribal, and local plans, policies, and programs.

After the public protest period and the New Mexico governor and Navajo Nation president's consistency review, the BLM and BIA will resolve all protests and address any inconsistencies. If necessary, they will publish a notice in the *Federal Register* requesting public comment on significant changes made because of a protest. The agencies will then prepare the approved RMPA and the agency-specific RODs. They then will announce in the *Federal Register* the availability of these documents.

The BLM and BIA will publish on the project website all final documents, including this report, newsletters, the Draft RMPA/EIS, and the NOA, as well as pertinent dates regarding solicitation of public comments.

5.2 CONTACT INFORMATION

The BIA and BLM invite and encourage the public to participate throughout the RMPA/EIS process.

The progress of the RMPA/EIS can be viewed at the project website, <https://www.blm.gov/programs/planning-and-nepa/plans-in-development/new-mexico/farmington-rmp-mancos-gallup-amendment>. Throughout RMPA/EIS preparation, the BLM and BIA will update the website with information, documents, and announcements.

Anyone wishing to be added to or deleted from the mailing list, wishing to change their contact information, or requesting further information may contact the BLM and BIA by any of the following methods:

BLM

- Mail—Mr. Mark Ames, RMPA Team Lead, Bureau of Land Management, Farmington Field Office, 6251 College Blvd. Suite A, Farmington, NM 87402
- Phone—(505) 564-7670
- Email—mames@blm.gov
- Project email—blm_nm_ffo_rmp@blm.gov

BIA

- Mail—Ms. Harilene Yazzie, BIA Supervisory Environmental Protection Specialist, P.O. Box 1060, Gallup, New Mexico 87301

- Phone—505-863-8287
- Email—harrilene.yazzie@bia.gov

Please provide your name, organization, mailing address, email address, and phone number, as well as the preferred method to receive information.

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CHAPTER 6

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Appendix A

List of Commenters

APPENDIX A

LIST OF COMMENTERS

Affiliations were assigned based on self-identifying information in the submission. Commenters who submitted comments on business, agency, or organization letterhead or who signed using their official agency title were considered to represent that organization. Submissions on the BIA and BLM comment form provided at the scoping meetings and on the project website were assigned the affiliation that commenters noted on the form. All other letters were considered to represent individuals. All comments received or postmarked on or before February 26, 2017, were included in this scoping report. The commenters are listed in alphabetical order by first name within each commenter type.

Table A-1
Affiliated Commenters

Commenter Name	Affiliation
Federal Government Agencies	
Aron Adams	National Park Service
Julia Guarino	Office of the Attorney General
Michael Quijano-West	National Park Service
Robert Houston	Environmental Protection Agency
Stacey Dwyer	Environmental Protection Agency
State Government Agencies	
Derrick Lente	New Mexico House of Representatives
Johnson Christopher	New Mexico Department of Game and Fish
Linda Lovejoy	New Mexico Public Relations Commission
Timothy Keller	New Mexico State Audit
Local Government Agency	
Howard Martinez	New Mexico, District 20
Leonard Martinez	La Merced Del Pueblo de San Joaquin Del Rio de Chama
Tommy Roberts	City of Farmington

Table A-1
Affiliated Commenters

Commenter Name	Affiliation
Tribal Governments	
Daniel Tso	Health Impact Assessment Committee of Counselor Chapter
Jessica Platero	Navajo Nation, Nageezi Chapter
Kurt Riley	Pueblo of Acoma
Leigh Kuwanwisiwma	The Hopi Tribe
Leonard Tsosie	Navajo National Council
(No signature)	Navajo Nation, Ojo Encino Chapter
Business/Commercial Sector	
Andrew Browning	Consumer Energy Alliance
Carla Sonntag	New Mexico Business Coalition
Clifton Horace	Consumer Energy Alliance
Erin Carmer	New Mexico Business Coalition
Gregory Bertelsen	National Association of Manufacturers
Jayne Mead	ConocoPhillips Lower 48
Kyle Tisdell	Western Environmental Law Center
Matthew Most	Encana Oil and Gas
Preston Phillips	AETHON Energy
Robert Mathes	Davis Graham & Stubbs LLP
Tripp Parks	Western Energy Alliance
Wally Drangmeister	New Mexico Oil & Gas Association
Educational Institutions	
Ruth Van Dyke	Binghamton University
Stephen Lekson	University of Colorado at Boulder
Organization (Nonprofit and Citizens Group)	
Allyson Siwick	Gila Resources Information Project
Amanda Podmore	The Wilderness Society
Ana Moran	San Juan Citizens Alliance
Anna Sofaer	Solstice Project
Ariel Dolfin	Fourth World Warriors
Beata Tsosie Pena	Tewa Women United
Boyd White Horse	White Horse Community member
Carla Sonntag	New Mexico Business Coalition
Cathy Purves	Trout Unlimited
David Nimkin	The Wilderness Society
Deborah Gangloff	Canyon Archaeological Center
Frankie Davis	Dine' Allottee Association
Janelle DiLuccia	National Trust for Historic Preservation
Jennifer Ho	Sierra Club-Moku Ola Chapter
John Roney	Solstice Project
Karin Foster	Independent Petroleum Association of New Mexico
Kim Howe	Dooda Fracking East Nav.
Kinyaanii qsnkii	A.I.M.
Lucy Herrman	Taos Archaeological Society
Maureen Finnerty	Coalition to Protect America's National Parks
Mike Eisenfeld	San Juan Citizens Alliance

Table A-1
Affiliated Commenters

Commenter Name	Affiliation
Moriah Jones	White Mountain Apache
N. Murphy	Fourth World Warriors
Naa baa hii	A.I.M.
Nada Culver	The Wilderness Society
Patrick Kincaid	Inherent Rights Agency
Paul Gallimore	Long Branch Environmental Education Center
Paul Reed	The Wilderness Society
Pete Dronkers	Earthworks
Rachael Lorenzo	Indigenous Women Rising
Rebecca Sobel	WildEarth Guardians
Richard Friedman	Solstice Project
Shane Cross	Trout Unlimited
Sophie Shemas	New Mexico Wildlife Federation
Tasi Malala	4th World Warriors
Thomas Mullins	Independent Petroleum Association of New Mexico
Todd Leahy	New Mexico Wildlife Federation
Wacey Blacksheep	Nihiignalbii Iima
William Clark	Rio Arriba Concerned Citizens
William Doelle	Archaeology Southwest
(No signature)	San Juan Citizens Alliance
(No signature)	Frack Off Greater Chaco Coalition
(No signature)	WildEarth Guardians
(No signature)	Sierra Club, Rio Grande Chapter
(No signature)	Archaeology Southwest

Table A-2
Individuals who Identified Tribal Affiliation

Commenter Name		
Amber Carillo	Jukari Davis	Pauline McCaulley
Arviso	Keioshiah Peter	Ray Begaye
Audra Benally	Kendra Pinto	Rechanda Lee
Brandy Baleaves	Kyle Devore	Robert Tohe
Chester Benally	La Vone Royston	Ruth Dan
Daniel Tso	LaFrenda Frank	Sandia Pueblo
Daryl Shack	Laurie Goodman	Scott Begay
Dorothy Keetso	Lee	Shanell Haynes
Ernest Toledo	Leo Charley	Shannell Haynes
Frankie Davis	Leona Tsinnajinnie	Steven Dunn
Jolena Calowe	Lois Pinto	Teddy Lopez
Juan Betoney	Lucille Charley	Towana Yepa
Juan Betonney	Mikaela Thinn	William Herrera
Judith Castiano	Nichole Garcia	

Table A-3
Individual Commenters

Commenter Name		
A.T. Cole	George Werito	Meredith Oliver
AB	Georgia Labey	Merian Soto
Adam Collins	Georgia Locker	Mia Lozada
Adam Savett	Geraldine January	Michael Butler
Adam Shaening-Pokrasso	Geri Rhodes	Michael Capeless
Adele Zimmermann	Gigi and Noah	Michael Darmody
Adeline Murthy	Gina Obrien	Michael Fiflis
Adelo Strasser	Gloria Emerson	Michael Francis
Adrian Wall	Gordon Parker III	Michael Gregory
Ahni Rocheleau	Graham Beyale	Michael Lavey
Aimee S	Grantsen	Michael Lawler
Akara Draper	Gregor Paslavsky	Michael Mains
Al Webster	Gretchen Yost	Michael Meade
Alan Osborne	Hannah Kligman	Michael Rhoderick
Alan Solomon	Hannah_Leigh Bull	Michael Richard
Aleks Kosowicz	Hannah-Leigh Bull	Michael Stiles
Alexa Lane	Harold Manning	Michael Weddington
Alexandra Sale	Harris Francis	Michael Wylie
Alfonso Chacon	Harry Whiting	Michelle Fuller
Alfred Myerson	Heather Snow	Michelle Haines
Alice Mulberry	Hedi Brooks	Michelle MacKenzie
Alice Yazzie	Heidi Brugger	Michelle Ottmers
Alicia Chavez	Helen Bushnell	Michelle Turner
Alicia Da Silva	Helen Greer	Mick Eddings
Alison Monroe	Helen Hays	Mikaela Thinn
Allan Whitesel	Henry Berkowitz	Mike Eisenfeld
Allison Brawley	Hilary Becker	Mike Evans
Almudena Ortiz	HK Gunn	Mike Kuntzelman
Alroy Ignacio	Holly Rankin	Mikhael Star
Althea McLuckie	Hope Alvarado	Mindy Newby
Alycia Lewis	Howard Higson	Miranda Friel
Alyssa Elliot	Huck Green	Mitsu Overstreet
Amalie Duvall	Hugh Peach	Miya King-Flaherty
Amanda Kuenzi	I Bold	M'Leah Woodard
Amanda Milster	Ike Eastuold	Moffsan
Amanda Singer	Ike Johnson	Molly Jackson-Nielsen
Andrew Farmer	Ilse Eve	Molly May
Amelia Bauer	Irene Hamilton	Molly Radosevich
Amos Hockmeyer	Irene Saikevych	Molly Shannon

Table A-3
Individual Commenters

Commenter Name		
Amy Dalzell	Iris Gersh	Monica Black
Amy Kaplan	Isaiah Crowfoot	Monica Crowfoot
Amy Larsen	Ivylle Anderson	Monica Patton
Amy Paige	J Swanson	Monica Quinones
Amy Roberts	J. Dekker	Monique Schoustra
Amy Schott	J. Kook	Monty Williams
Andrea Pucci	J.P. Hanby	Moss Templeton
Andrelene Babbit	Jack Harlan	Mosserella Sunshine
Andrew Bramble	Jack Stansfeild	Murphy Zohane
Andrew Butler	Jacob Raitt	Murphy Zohnnie
Andy Taute	Jacquie Lowell	N. Ellen Boling
Andy Young	Jaida Grey Eagle	Naima Shea
Angela Lahman	Jaime Yazzie	Nan Clancy
Angela Werneke	Jake Arnold	Nancy Boudrie
Angelica Lopez-Brody	Jake Hodie	Nancy Carringer
Angelika Czegan	James Ballard	Nancy Coonridge
Angelita O'Connor	James Corcoran	Nancy Dean
Angelo Ruskin	James Jakusz	Nancy Fisher
Angie Unruh	James Klein	Nancy Gilkyson
Ann Dougherty	James Lazell	Nancy Gough
Ann Evans	James Olson	Nancy Hellsten
Ann Lowe	James Therrien	Nancy Howard
Ann Perkins-Parrott	James Therrier	Nancy Kier
Ann Sherman	James Zion	Nancy King
Ann Stockdale	Jamie Watchman	Nancy Lowell
Ann Tracy	Jan Bachman	Nancy Neskauskas
Ann Wylie	Jan Christine	Nancy Rehe
Anna Rondon	Jan McCreary	Nancy Zastudil
Annamaria Laverty	Jan Tervydis	Naomi Klass
Anne Dal Vera	Jane Beattie	Nat Wilson
Anne Hoop	Jane Perry	Natalie Atheram
Anne Lowe	Jane Ruge	Natalie Orr
Anne Markward	Jane Sooby	Natalina Oliverio
Anthony Lee	Janene Yazzie	Natasha Seegert
Anthony Ricketts	Janet Altobello	Navona Gallegos
Anthony Wenzell	Janet McDonnell	Neal Jones
Anthony Wingo	Janice Cleary	Ned Rollins
Antonia Shouse	Janice Stocker	Nel Iliohan
April Johnson	Janine Kondreck	Neville Bruce

Table A-3
Individual Commenters

Commenter Name		
April Mondragon	Janis Louthis	Nicholas Brown
April Shorty	Jasmine Curtis-Moore	Nicholas Evans
Arden Hendrie	Jason Sandel	Nicholas Zaleski
Argos MacCallum	Jean Adams	Nick Evans
Ariel Bickel	Jean Maher	Nicole Damico
Arlene Forward	Jeandie Resenburg	Nicole Estrada
Arlene Hansen	Jeanette Iskat	Nicole Horseherder
Arnold Farley	Jeanine Broeck	Nicole Pennebaker
Art Burton	Jeanne Devine	Nikole Mitchell
Ashley Carter	Jeanne Stulb	Nola Naha
Athena Bernal	Jeannine Johnson	Nomi Green
Aubrey Martinez	Jeff Carlton	Norm Ellis
Audrey Cullen	Jeff Clark	Norma Bishop
Austin Thayer	Jeffrey Lewis	Norman Bishop
Avelina Bardwell	Jeffrey Stone	Norman Doggett
Bachman	Jenni Siri	Oak Norton
Barbara Boyd	Jennifer Flynn	Orlando White
Barbara Chapman	Jennifer French	Orlondo Haven
Barbara Endicott	Jennifer Graves	Owen
Barbara Frames	Jennifer Lake	P. H.
Barbara Gavurnik	Jennifer Lyke	P.L. Kalbac
Barbara Hegedus	Jennifer Marley	Paddy Connolly
Barbara Higgins	Jennifer Niemann	Page Gandy
Barbara Hughes	Jennifer Pretzeus	Pam Hanna
Barbara Jacobsen	Jenny Engleman	Pam Mayberry
Barbara McMahan	Jerome Walker	Pam Nelson
Barbara Mohon	Jerry Chilson	Pam Pierce
Barbara Poland	Jesse Chanley	Pamela Benton
Barbara Schroder	Jessica Miller	Pamela McDonald
Barbara Turner	Jessica Montoya	Pat
Bee Falcon	Jessica Rath	Pat Duncan
Bekki Bearheart	Jessie Mcdade	Pat Musick
Berry Ives	Jill Caritas	Pat Wagner
Bessy Berman	Jill Cliburn	Pat Wolff
Beth Leary	Jill Joseph	Patricia Aguirre
Bethe Orrell	Jim Angerer	Patricia Coan
Betsy Conover	Jim Brett	Patricia Duncan
Bette Korber	Jim Martin	Patricia Green
Betty Lay	Jim Mueller	Patricia Knol

Table A-3
Individual Commenters

Commenter Name		
Beverly Babb	Jim O'Donnell	Patricia McClenny
Beverly Maxwell	Jim Steitz	Patricia Morrison
Blythe Morrison	Jim Turley	Patricia Reda
Bo Bergstrom	Jo Ann Hakola	Patricia Rowell
Bob Anderlik	Joan Christensen	Patricia Siri
Bob Brister	Joan Hess	Patricia Stauber
Bob Gaines	Joan Robbins	Patricia Taylor
Bob Larson	Joan Robins	Patricia Whitesel
Bobbe Besold	Joan Rogers	Patrick Conn
Bobby Martin	Joan Young	Patty Elliot
Bobby Mason	Joanna Weinstock	Paul Davidson
Bonnie M.	JoAnne Lee	Paul Lauck
Bonnie Matton	Joanne McLain	Paul Moss
Brandon Basino	Joaquin Karcher	Paul Palla
Brandon Benallie	Jodi Dragoni	Paul Watson
Brenda Hayes	Jodie Buller	Paul Wright
Brenda Howell	Joe Ward	Paul Yoder
Brendan McKinney	Joel Crews	Paula DeFelice
Brett Masse	Joel Okeefe	Paula Narbutovskih
Brian Capitan	John Blagg	Paula Surmann
Brian Evans	John Burrige	Paulina Inigo
Brian Halona	John Deddy	Peaches Blackbird
Brittany Martinez	John Gammon	Peg Rooney
Bruce Christopher	John Hoffert	Peggy Blanchard
Bruce Smith	John Lissoway	Peggy La Point
Bruce Trigg	John O'Donnell	Penny Truitt
Bryan Joe	John Otter	Percy Deal
Bryan Tom	John Schuenemyer	Pete Dronkers
Byron Aspaas	John Ussery	Peter Conner-Estrada
Byron Shorty	John Vogel	Peter Di Giacomo
Cameron Ming	John Watts	Peter Fieweger
Cammie Blaisdell	John Welch	Peter Nordori
Candace Duran	John Wiener	Peter Sloan
Candance Craig	John Wilson	P.F. Siri
Carl Rosenberg	Jolena Palav	Phil Leckman
Carla Stoutamyer	Jon Klingel	Philip Ratcliff
Carla White	Jon Spar	Philip Verellen
Carles Benally	Jonathan Cruise	Phyllis Mains
Carol Calvert	Jonathan Dowell	Polly Freeman

Table A-3
Individual Commenters

Commenter Name		
Carol Davis	Jonathan Schwartz	Priscilla Payne
Carol Fugagli	Jonette Slabey	Priscilla Weaver
Carol Hatfield	Jordan Minkin	R. David
Carol Jacquet	Josef Kasperovich	R. Harman
Carol Jurczewski	Joshua Powell	R.A.L West
Carol Kepler	Josue Aranda	Rachael Lorenzo
Carol Licini	Joyce Allington	Rachel Scarlata
Carol Norris	Joyce Blalock	Rachel Walsh
Carol Sassaman	Joyce Cochran	Rachel Wickart
Carole Ehrhardt	Joyce Frohn	Rachel Zollinger
Caroline Wareham	Joyce Nicholson	Radmilla Cody
Carolyn Huber	Juan Betonney	Rae Domenico
Carolyn Pretzer	Juanita Toledo	Rael Nidess
Cary Arden	Jude Marx	Ralph Timberlake
Cassie Landrum	Judi Gooding	Randall Benally
Cate Cabot	Judi Hendricks	Randall Storm
Catharine Stringfellow	Judith Chaddick	Rashada Parks
Catherine	Judith Clark	Ray Heilman
Catherine Beauchamp	Judith Gooding	Ray Imel
Catherine Cox	Judith Isaacs	Read Brugger
Catherine Lynch	Judith Maron-Friend	Rebecca A. Wills
Catherine Williamson	Judith Shotwell	Rebecca Dresser
Cathern Murphy	Judy Ackerman	Rebecca Elder
Cathrael Hackler	Judy Day	Rebecca Heidenreich
Cathy Kumar	Judy Fariless	Rebecca Heisler
Cathy Robison	Judy Ferguson	Rebecca Meehan
Cathy Williams	Judy Lubow	Rebecca Sise
Cecilia Barber	Judy Todd	Rebecca Sobel
Cecily Corazon	Julie Hennerty	Rebecca Soleb
Celia Kutcher	Julie Jacobs	Rebecca Stair
Chad Yen	Justin Lorenzo	Rey Deveau
Char Laughon	K. Bensusen	RG Kinsey
Charlene Jones	K. Burgess	Rhonda Cardwell
Charles Bandy	K. Danowski	Rich Farrington
Charles Benally	K. Austen	Rich Schrader
Charles Clements	Kaaren Allen	Richard Chelew
Charles Creekmore	Kalonji Bobb	Richard Creswell
Charlotte Jones	Karen Argeanas	Richard Grossman
Charlotte Ownby	Karen Bentrup	Richard Herrnstadt

Table A-3
Individual Commenters

Commenter Name		
Charlotte Toledo	Karen Britton	Richard McClave
Chas Pogel	Karen Clark	Riege
Chason Russell	Karen Hendricks	Rita Glasscock
Chee Smith	Karen Hickerson	Robert Balir
Chee Treston	Karen Jacques	Robert Ball
Chenelle Haines	Karen Koch	Robert Cole
Cherrie Lum	Karen Maxa	Robert Dennard
Cheryl Baker	Karen Razzano	Robert Dolci
Cheryl Crane	Karen Vargas	Robert Grady
Cheryl Marceau	Karilyn Haozousk	Robert Kuhnert
Cheryl Mitchell	Karin Ralph	Robert Miles
Cheryl Rolinda	Karina Hean	Robert Neal
Cheryl Stafford	Karrie Cooper	Robert Poorman
Chester Benally	Kary Pierce	Robert Spies
Chester Johnson	Kate Jones	Robert Tohe
Chetan Kinsey	Kate Miller	Robert Winters
Cheyenne Antonio	Katherine Axelarris	Robert Yazzie
Chris Anderson	Katherine Curtis	Roberta Keppel
Chris Isensee	Katherine Delanoy	Roberta Newman
Chris Mendel	Katherine Dobson	Roberta Thompson
Chris Mendoza	Katherine Gould-Martin	Robert A. Walker
Chris Rasmussen	Katherine Hutchins	Roberto Notlouis
Chris Wismer	Katherine Kunes	Roberto Nutheris
Christen Clifford	Katherine Leahy	Robin Patten
Christian Gering	Katherine Porter	Robyn Cascade
Christina Bouajila	Katherine Slawinski	Robyn Richards
Christina Di Marco	Katherine Waller	Roger Hollowell
Christina Kontz	Kathi Hopkins	Rolanda Ritzman
Christine Madley	Kathleen Corona	Romeo Tango
Christopher Boyce	Kathleen Faller	Ron Booth
Christopher Lish	Kathleen Kimberling	Ron Sharpe
Chuck Creekmore	Kathleen Vanderbrook	Ronald Christ
Chuck Haven	Kathryn Albrecht	Ronald Short
Chuck Mazziotti	Kathryn Morrison	Ronald Stauber
Chuck McAllister	Kathrynn Sundermann	Ronnie Ortiz
Cinda and John Graham	Kathy Bradley	Rose Estes
Cindy Anderson	Kathy Chaney	Rosemary Kelly
C.J. Cullinan	Kathy Gilyard	rowan stanland
Claire Barnett	Kathy Klein	Roxanne Nez

Table A-3
Individual Commenters

Commenter Name		
Clara Zschaler	Kathy Kwait	Runell Seale
Clare Beelman	Kathy Whitman	Russ Knight
Clarence Costillo	Katie Ingham	Ruth Reid
Claudia Chapman	Katrina Rachwitz	Ruthie Edd
Clay Ellis	Katrina Stroud	Ryan Howard
Cliff Evans	Katy Gross	Ryan Sarhan
Clifton Horace	Katy Stuckel	S. Ortiz
Clint Nagel	Kay Lockridge	S. Roybal
Cole Larsen	Kay Warren	S. Logan
Colin Treworgy	Kaylie Penner	Sabrina Hardenbergh
Colleen Cabot	Keith King	Sabrina John
Colleen Cooley	Kellie Turley	Sallie Bingham
Collin Smith	Kelly Fearney	Sally Elgin
Connie Anderson	Kengang Nzali	Sally McDaniel
Connor DeVane	Ken Augustine	Sally McDuff
Cora Cliburn	Ken Odenheim	Sally Patton
Coral Pitkin	Kendra Pinto	Sally Small
Coralie Carraway	Kenneth Collins	Sally Vogel
Corey Wellik	Kenneth Mullens	Sally Yost
Cornelia Shearer	Kenneth Nova	Sam Butler
Cory Kerns	Kent Grantsen	Sam Ford
Craig Bert	Kevin Belin	Sam Holden
Craig Downer	Kevin Clayton	Sam Karns
Curtis Nimz	Kevin Parkinson	Sam Slater
Cyndi	Kim Weaver	Samantha Brody
Cyndy Roy	Kim Whitman	Sammie Jim
Cynthia Dettman	Kimberly Rabbeni	Samuel Sage
Cynthia Dow	Kolian Daniels	Sandra Blakely
Cynthia Edney	Kovan	Sandra Dodge
Cynthia Eggert	Kristen Mico	Sandra Nemeth
Cynthia Kimball	Kristie Atwood	Sandra Perkins
Cynthia Miller	Kristin Rosenqvist	Sandra Shoshani
Cynthia Patterson	Krystala Kalil	Sandra Witbeck
Cynthia Philips	Kurt Janz	Sandy Fye
Cynthia Pirie	Kye Sangha	Sandy Toland
Cynthia Romesburg	Kyle Larry	Sandy Wagner
D. Dennard	Kyle Rouckus	Sara Haskie
D. Spaulding	Kymberlee Wolfe	Sara Mendoza
Dacia Murphy	L. Roystan	Sara Michl

Table A-3
Individual Commenters

Commenter Name		
Daisy Davis Askey	L. Bagley	Sara Steeleworks
Daisy Kates	La Vone Royston	Sara Tilford
Dale Deneweth	Lacey Levitt	Sarah Jacobson
Dale Hushbeck	Lajeanne Leveton	Sarah Lyons
Dale Latta	Lana Beatty	Sarah Stout
Dan Kent	Lani Tsinnajinnie	Sarah Thompson
Dana Eldridge	Lara Post	Sarah Tuttle
Dandy Taylor	Larry	Sarah Willis
Daniel Boling	Larry Sonntag	Saralinda Lobrose
Daniel Johnson	Latoya Nockideneh	Saraswati Khalsa
Daniel Padilla	Laura Burnley	Sari Stein
Daniel Tso	Laura Cotts	Sauder Witbeck
Danielle Griego	Laura Cuplin	Scott Corwin
Danielle Steele	Laura Herndon	Scott Messick
Darlene Blake	Laura Marshall	Scott Workinger
Darlene Carrillo	Laura Polanco	Sebastian Pivnicka
Daryn Campbell	Laura Robbins	Sedale Tsosie
David	Laura Smith	Shannon Starkey
David Beers	Laura Stransky	Sharon Austin
David Bezanson	Laurance Johnston	Sharon Christensen
David Bounds	Laurel Howe	Sharon Gonzalez-Alei
David Boyer	Lauren Haupt	Sharon SchulzElsing
David Butler	Lauren McKean	Sharon Vocale
David Calhoun	Lauren Vliet	Shauna Lindsay
David Fowler	Lauri Costello	Shauna Stoltz A. Laurie
David Gerke	Laurie	Shawn Rico
David Hamilton	Laurie Carpino	Shaylee Vandever
David Henning	Laurie Jensen	Sheila Fox
David Jacobson	Laurie Marnell	Sheila Mendoza
David McDaniel	Laurie Parkinson	Sheila Spencer
David Radcliff	Laurie Price	Shelby
Dawn Albanese	Lavette Ulichnie	Sheldon Natoni
Day	Lavinia Henry	Shelly Medlin
Dean Sanchos	Leah Boyd	Sherri Kalman
Deb Mitchell	Leah Hoffman	Sherry Lewis
Deb Paulson	Lecia Cornett	Sheryl Sussbauer
Deborah Charley	Lee Johnson	Shinann Earnshaw
Deborah Christensen	Lee Nichol	Silda Mason
Deborah Craig	Lee Patchell	Silvia Fleitz

Table A-3
Individual Commenters

Commenter Name		
Deborah Dennard	Lee Shropshire	Silvia Stenitzer
Deborah Lycan	Lee Verner	Siri Khalsa
Debra Salopek	Leigh Hudacek	Stacey
Dede Christopher	Len Messina	Star Sanchez
Dedrick Lund	Lena Bennet	Stephanie Dressen
Dee Downing	Leno Sislin	Stephanie Krantz
Deirdre Wampler	Leonard Tsosie	Stephanie Longhi
Delaney Pearson	Leslie Larsen	Stephen Lekson
Delta Yazzie	Leslie Richter	Stephen Read
Dennis Kane	Leslie Schein	Stephen Rosenblum
Dennis Wingle	Leslie Thompson	Stephen Sachs
Derek Wallentinsen	Leslie Ufford	Stephen Sans
Desiree C.	LeTanya Thinn	Stephen Schmidt
Diana Crowson	Lily Schlien	Stephen Station
Diana Gries	Linda Clark	Stephen Verchinski
Diana Kelly	Linda Deno	Steve Clarke
Diana Ohlson	Linda Doherty	Steve Dragoni
Diane Alavi	Linda Gurley	Steve Ellison
Diane Bloom	Linda Johnston	Steve Speth
Diane Carlton	Linda Rossin	Steven Dunn
Diane Luck	Linda Walsh	Steven Handwerker
Diane Nowicki	Linda Wheelbarger	Steven Moffson
Dianna Macleod	Lindsay Leigh	Steven Read
Dini DiNatale	Lindy Pierce	Steven Wade
Dolores Garcia	Lisa Bowdey	Styx Latte
Don Cramer	Lisa Conner	Sue A.
Don Straley	Lisa Ehle	Sue Corwin
Donald H Smith	Lisa Pence	Sue DeVall
Donald Thompson	Lisa Tso	Sue Husch
Donavan Thompson	Lisa Yount	Sue Roujansky
Donna Caira	Lissa Ray	Sunny Dooley
Donna Calles	Liz Lata	Susan Andress-Bontrager
Donna Detweiler	Lois Owens	Susan Babbitt
Donna Mayer	Lois Staub	Susan Blaisdell
Donna Stewart	Lora Schwartzberg	Susan Drobeck
Donna Swanson	Loretta Valenski	Susan Etter
Donna Vogel	Lori Landstrom	Susan Frye
Donna Webb	Lorna Marchand	Susan Gerke
Donna Yoder	Lorraine Becenti	Susan Gordon

Table A-3
Individual Commenters

Commenter Name		
Doris Vician	Lorraine Specht	Susan Gorman
Dorothy Keetso	Louis McClave	Susan Janke
Dorothy Kethler	Louise Benally	Susan Kazmiensk
Dorothy Moloney	Louise Mills	Susan Morris
Dorothy Motheral	Lozz Starseed	Susan Pearson
Dottie Butler	Lucas Sandoval	Susan Pierce
Doug Krause	Lucinda Lynch	Susan Schauer
Doug Parker	Lucy Lippard	Susan Schmitke
Douglas Conwell	Lupita Salazar	Susan Selbin
Douglas Kaufman	Lura Brookins	Susan Tarmen
Douglas Sporn	Lyn Lowry	Susan Weber
Drew Martin	Lyncia Begay	Susann McCarthy
Duane Karren	Lynda Garner	Susanne Fistans
Duane Yazzie	Lynda Prim	Susanne Gunckel
Duncan Duchov	Lynn Damon	Susie Philemon
Dwarka Bonner	Lynn Gray	Suzanne Marcinkiewicz
Dylan Johnson	Lynn Lessard	Suzanne Williams
E Allison	Lynn Ratener	Suzy Hayes-Tripp
Earl DeBrine	Lynne Fischer	Sydney Berner
Earnestine Simmons	Lynne McGee	Sydney Weldon
Ed Gibbons	Lyra Barron	Sylvia Williamson
Ed Loosli	M Bittleston	Syndee Murphy
Ed Parks	M. Ellen	Tamara Bronson
Edith Powers	M. Kaiser	Tania Malven
Edmund McWilliams	M.J. Whiteman	Tanya Ishikawa
Edmund Pinto	Madeline Williams	Tasi Malala
Edna Litten	Maggie Towne	Taylor Coccari
Edward Buxton	Maggie Washburne	Teahonna James
Edyne Gordon	Makai Lewis	Ted Dreier
Eileen Music	Malcolm Mitchell	Ted Ullman
Eileen Sopanen	Malinee Crapsey	Teddy Lopez
Eirena Begay	Mandy Stapleford	Teresa Rex
Elaine Becker	Marcia Ewell	Teresa Tenorio
Elaine Hinman-Sweeney	Marcie Ryan	Tern Wildermuth
Elaine Kaiser	Marcus Lanskey	Terri Watson
Elaine Lefervre	Marcy Meachum	Terry Sloan
Elisabeth Dicharry	Margaret Galletley	Terry Storch
Elise Benson	Margaret Johnson	Terry Vanderbrook
Elizabeth Blumenstock	Margaret Kuhlen	Terryl Peterson

Table A-3
Individual Commenters

Commenter Name		
Elizabeth Costigan	Margaret Latalin	Tess Morgan
Elizabeth Faithorn	Margaret Little	Theo Giesy
Elizabeth Falcon	Margaret Vicuna	Theresa Palmer
Elizabeth Haymond	Margaret Young	Theresa Sesta
Elizabeth Hunter	Margarita Denevan	Thom Fortson
Elizabeth Jordan	Margery Sudsataya	Thom Holzer
Elizabeth Kinney	Margie McCloy	Thomas Aubin
Elizabeth Mann	Margo Wyse	Thomas Keys
Elizabeth Nielsen	Maria Dougherty	Thomas Talbot
Elizabeth Thomson	Maria-Christina Sack	Thomas Taylor
Elke Hoppenbrouwers	Mariah Williams	Thomasine Montoya
Ella Armstrong	Marie Baca	Thompson Chee
Ella Joan	Marie Gladue	Tim Levatich
Ellen Ackerman	Marietta Scaltrito	Tim Towns
Ellen Foster	Marilyn Hoff	Timothy Biel
Ellen Halbert	Marilyn Lohr	Timothy McCullough
Ellen Kohn	Marilyn McCord	Timothy Thomas
Ellen Koivisto	Marilyn Taylor	Tina Kachele
Ellen La Penna	Marilynn Cencioso	Tina Shurtleff
Ellyn Derman	Marion Seymour	Tiska Blantsending
Elovonne Benally	Marissa Naranjo	TJ Thompson
Elsa Vreeland	Mark Grotzke	Todd Selle
Emanuel Furst	Mark Holland	Todd Warnke
Emelie Olson	Mark Leclair	Tom Mullins
Emily Bono	Mark Levy	Tom Pogwizd
Emily Cheney	Mark Luce	Tommy Tomlin
Emily Darby	Mark Meeks	Toni Pendergrass
Emily Mansfield	Mark Schmerling	Tony Gioia
Emily Richards	Marla Foreman	Tonya Ben
Emily Sleger	Marlana Milne	Tory Larsen
Emma Boddery	Martha Michels	Tracy KittsBeck
Emma Difani	Martin Gavurnik	Tracy McBride
Emma Lloyd	Martina Dinale	Travis Henley
Emmy Kogonen	Mary Ann	Travis Mihtukwsun
Enoch Endwarrior	Mary Brown	Tricia Orr
Ephraim Schofield	Mary Bryant	Trish Heck
Ephraim Anderson	Mary Co	Tyree Benally
Eric and Cedra Spragett	Mary Grana	U. Hugo Rupp
Eric Lehmann	Mary Harrison	Valerie Clement

Table A-3
Individual Commenters

Commenter Name		
Eric Willie	Mary Hicklin	Vanessa Nielsen
Eric Zeiler	Mary Kaoles	Vicki Whitaker
Erin Benally	Mary Kurt-Mason	Vincent Yazzie
Ernest Hubbell	Mary Maynard	Virgil Chavez
Esther Kovari	Mary Meuser	Virginia Dotson
Etta Arviso	Mary Moorehead	Virginia Edwards
Eugenia Larson	Mary Mountain	Virginia Jones
Evalyn Bemis	Mary Muraski-Stotz	Virginia May
Evan Hyde	Mary Ownby	Virginia Mudd
Evelina Bridgewater	Mary Reichley	Virgl Tsosie
Fatima Van Hattum	Mary Shirley	Wallace Elton
Felicia Santini	Mary Sojourner	Wallace White
Florence Gaia	Mary Steele	Walter Nelson
Fran Watson	Mary Trujillio	Wanda Hendrix
Franca Lemieux	Mary Van Scoyk	Ward McCartney
Francine Foster	Mary Vorachek	Warren Unsicker
Francis Burns	Mary Westerlund	Wendy Constantine
Frank Cullen	Marylou Butler	Wendy Dolci
Frank Lyons	Mathew Morrison	Wendy Fast
Frankie Davis	Mathilde Walker	Wendy McLean
Frankie Sasha	Matias Miguelez	Wendy Niemeyer
Fred Adler	Matt Jones	Wendy Segay
Fred Powledge	Matthew Chase-Daniel	Wendy Tanner
Frederick Tracy	Matthew Vencill	Weslie Phillips
G.G.	Maureen Gonzales	William Azevedo
Gabriela Fonseca	Mauria McClay	William Barrett
Gaia Mika	Maurice Mackey	William Haines
Gail Dalmat	Maurreen Skowran	William LeMaire
Gail Lavey	Max Neutra	William Roberson
Gail Rein	Maya Abela	William Saylor
Gary Bailey	Maya Pena	Willie Picaro
Gary Cook	Maya Rommwatt	Win Wright
Gary Pchansky	MB McAfee	Yolanda Garcia
Gary Skiba	McKenna Hedgepeth	Yovonne Autrey-Schell
Gayle Brown	Megan McKinney	Yvonne Ricard
Gaylord Slow	Melinda Davis	Yvonne Williams
Gene Ammarell	Melissa McKibben	Zack Mortensen
Genevieve Barrett	Melvin Bautista	Zita Xavier

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Individual Commenters

Commenter Name		
Genevieve Mitchell	Melvin Harrison	Zoe Krasney
Geoffrey Cunnar		