



**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

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3100

**September 2016 Competitive Oil and Gas Lease Sale**

**DOI-BLM-UT-W020-2017-0001-EA**

**Errata Sheet**

The revised EA was posted on June 2, 2017. It was quickly brought to the attention of the BLM that three comment letters for the preliminary EA had been overlooked prior to the posting. No issues brought forward in these three comment letters warranted further revision to the analysis in the EA. This errata updates the Section 5 of the EA and Appendix F (the comment response table) to reflect the additional comments received.

Section 5.2, Table 7 is changed as follows

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Public Lands Policy Coordination Office (PLPCO)	Coordinated with as leasing program partner.	A letter transmitting the preliminary list of parcels was sent on October 26, 2016. PLPCO responded with a comment letter to the EA on May 1, 2017.

Section 5.5 is changed as follows:

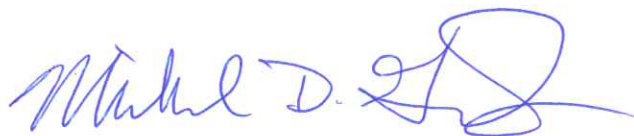
The BLM acknowledges the concerns expressed by the public regarding the leasing of oil and gas resources on the public lands within FFO. Four letters were received, one of which was unsubstantive. Three others from (collectively) Western Watersheds Project, Center for Biodiversity, American Bird Conservancy, WildEarth Guardians, and Wild Utah Project; (collectively) The Wilderness Society, the National Audubon Society and the Southern Utah Wilderness Alliance and PLPCO. Information within the letters that is background or general in nature was reviewed; however, responses to these items are not necessary. Likewise, expressions of position or opinion are acknowledged but did not necessitate a change in the analysis. As identified in the NEPA Handbook (H-1790-1), BLM looked for modifications to alternatives, factual corrections, and modifications to the analysis while reviewing public comments. The responses can be found in Appendix F.

Table *Comment Responses for September 2017 Oil & Gas Lease Sale Fillmore Field Office* in Appendix E

Comment	Comment Summary	Response
10 The Wilderness Society et. al.	(T)he proposed action in this lease sale EA – to lease parcels within the Sheeprocks PHMA - directly contradicts and undermines the hard trigger adaptive management goals expressed in the UT ARMPA. The EA would authorize new oil and gas development just when “immediate action is necessary to stop severe deviation from GRSG conservation objectives” and “more restrictive management will be required” to protect the population. At the same time as BLM is taking measures to try to save and restore the Sheeprocks population, it is proposing new development it admits would “further imperil” the population. EA, p. 38 (“Because this population of sage-grouse is small and in a critical population decline, the resistance and resiliency of this population to recovery from incremental increased human pressure, noise and disturbance, sage-grouse populations within the area could be further imperiled.”). The proposed action would undermine the adaptive management goals in the UT ARMPA as well as the actions already underway to improve the health and well-being of the Sheeprocks population and its habitat.	The BLM has followed the adaptive management plan outlined in Appendix I of the ARMPA by converting the Sheeprocks GHMA to PHMA and applying all the applicable stipulations and notices to the lease parcels. The portions of the parcels containing PHMA will be stipulated to have No Surface Occupancy (NSO). In addition, all of the parcels have portions that are outside of the PHMA (see Table 5 in the EA) and can be developed without surface disturbance within PHMA.
11 The Wilderness Society	In addition, the plan to lease four parcels in PHMA would not comply with the requirement to ensure a net conservation gain for sage-grouse when management actions are taken that could result in habitat loss or degradation. This is a required provision under the Record of Decision and Approved Resource Management Plan Amendments for the Rocky Mountain Region. <sup>5</sup> The BLM must ensure that this mitigation requirement is met; and the EA and decision document should ensure this compliance.	Lease notice UT-LN-131 states: “In Priority and General Habitat Management Areas (PHMA and GHMA) all actions that result in habitat loss and degradation will require mitigation that provides a net conservation gain to the Greater Sage-Grouse (GRSG). Mitigation must account for any uncertainty associated with the effectiveness of the mitigation and will be achieved through avoiding, minimizing and compensating for impacts. Mitigation will be conducted according to the mitigation framework found in Appendix F in the Utah Approved Management Plan Amendment.”
12 The Wilderness Society	BLM cannot simply claim to have applied IM 2016-143 and its prioritization sequence (in part to further hard trigger adaptive management goals) without any actual analysis or explanation as to why its proposed action would offer every nominated parcel for sale (i.e., why the prioritization sequence had no actual effect on the leasing decision). Especially where, as here, the factors appear to weigh against a leasing decision, BLM must offer some explanation as to how IM 2016-143 informed its proposed action and explore how the parcel-specific factors apply. The lack of any meaningful analysis of the prioritization sequence and the absence of any reference to the parcel-specific factors in the draft EA is inconsistent with the analysis and decision-	See response to Comment 2

Comment	Comment Summary	Response
	making in other BLM lease sale EAs with parcels in sage-grouse habitat. In the final EA, BLM must apply the prioritization sequence and parcel-specific factors from IM 2016-143, and, consistent with other lease sale EAs, explain how the sequence and factors informed its proposed action.	
13 The Wilderness Society	<p>Despite these directives, as well as the “hard look” requirements of NEPA, the draft EA fails to consider, let alone measure and estimate, the impact that noise from development on the proposed leases would have on the Sheeprocks sage-grouse population. To begin with, the EA acknowledges that BLM does not actually know the extent to which greater sage-grouse use and inhabit the lands encompassed by the proposed parcels, complicating any effort to estimate or address potential impacts. EA at p. 23 (“It is unknown at this time the level of sage-grouse use in this portion of the PHMA.”). The EA does not incorporate, reference or address ambient noise levels in Sheeprocks PHMA leks. It does not attempt to quantify how exploratory drilling and development activity on the leased parcels might affect ambient noise levels in the Sheeprocks habitat. Nor does it consider “additional research and information” on noise impacts or evaluate “new limitations” or implement “appropriate measures...to minimize potential for noise impacts on PHMA GRSG population behavioral cycles,” as required by the Utah ARMPA. Rather, the EA includes only general statements that noise impacts might affect local populations of sage-grouse (among a number of other potential impacts) and adopts generic, baseline protections for noise impacts. <i>See e.g.</i>, EA at p. 34 (“It can be anticipated that increased human activity, noise, disturbance, and habitat alteration can modify sage-grouse behavior, movements, and habitat quality/quantity; further potentially impacting successful breeding, nesting, brood-rearing and use of winter range.”), pp. 46-64....the EA should estimate the extent to which greater sage-grouse use and occupy the proposed parcels. It should also identify baseline noise levels within the Sheeprocks PHMA and explore recent research and literature on the effects of noise on sage-grouse populations. Then, using this data, the EA should explore how a leasing decision would affect baseline noise levels and consider whether additional stipulations and lease notices are necessary to protect and restore the Sheeprocks population, in accordance with the Utah ARMPA.</p>	<p>Sections 4.2.1.3 has been updated to address impacts from development outside the PHMA. In addition, Stipulation UT-s-356 requires limiting noise from anthropogenic disturbances at occupied leks within PHMA. Section 3.3.3 has also been updated to provide the best available information in the Sheeprocks population area.</p>
14 Utah Public Lands Policy	Sage-Grouse Priority Habitat Management Areas) should be removed from parcels UT0817-001, UT0817-002, UT0817-003, and	The BLM must apply the appropriate stipulations from the ARMPA as of September 2015 If, at the time of

Comment	Comment Summary	Response
Coordination Office	<p>UT0817-007. The BLM's so-called "Greater Sage-Grouse Priority Habitat Management Areas" frequently contain large tracts of pinyon-juniper woodland or other biomes that are not suitable GRSG habitat and provide no benefit to the species. The imposition of NSO stipulations within all GRSG PHMAs will likely discourage oil and gas leasing in the parcels listed above while providing minimal benefit to GRSG habitat. The BLM should use other means to protect actual GRSG habitat in PHMAs while still promoting oil and gas development on the surface. For example, the BLM could require controlled surface use and timing limitation stipulations to protect actual GRSG habitat while freeing up non-habitat for greater surface development. BLM staff should consult the Utah Division of Wildlife Resources (UDWR) and the State's Conservation Plan for Greater Sage-Grouse in Utah to determine which areas of the PHMA's actually contain GRSG habitat. Sage-Grouse Priority Habitat Management Areas) should be removed from parcels UT0817-001, UT0817-002, UT0817-003, and UT0817-007. The BLM's so-called "Greater Sage-Grouse Priority Habitat Management Areas" frequently contain large tracts of pinyon-juniper woodland or other biomes that are not suitable GRSG habitat and provide no benefit to the species. The imposition of NSO stipulations within all GRSG PHMAs will likely discourage oil and gas leasing in the parcels listed above while providing minimal benefit to GRSG habitat. The BLM should use other means to protect actual GRSG habitat in PHMAs while still promoting oil and gas development on the surface. For example, the BLM could require controlled surface use and timing limitation stipulations to protect actual GRSG habitat while freeing up non-habitat for greater surface development. BLM staff should consult the Utah Division of Wildlife Resources (UDWR) and the State's Conservation Plan for Greater Sage-Grouse in Utah to determine which areas of the PHMA's actually contain GRSG habitat.</p>	<p>development, it is determined that specific areas within the PHMA do not contain GRSG habitat the exception to the NSO stipulation can be considered.</p>



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