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1.0 INTRODUCTION

1.1 OVERVIEW

1.1.1 Background

The Bureau of Land Management (BLM) White River Field Office (WRFO), located in Meeker, Colorado is preparing an amendment to the current Resource Management Plan (RMP), which was approved in July 1997 (*White River Record of Decision and Approved Resource Management Plan*). This RMP did not account for recent increased requests for oil and gas development within the WRFO boundaries. Therefore, the WRFO proposes to prepare an amendment to the RMP to modify the extent of oil and gas development within its boundaries above that anticipated in 1997. This Resource Management Plan Amendment (RMPA) is being developed in conjunction with an Environmental Impact Statement (EIS) that will analyze the potential impacts of increased oil and gas development on a field office-wide level. The EIS will comply with the National Environmental Policy Act of 1969 (NEPA), Council on Environmental Quality regulations implementing NEPA, the Federal Land Policy and Management Act of 1976 (FLPMA), and other associated regulations.

In accordance with the FLPMA, the BLM has management responsibility for public land and its resources for present and future generations. Current management direction for the WRFO is provided by the RMP approved in 1997. Title 43 Code of Federal Regulations Part 1600 (43 CFR 1600), states that the objective of an RMP “is to maximize resource values for the public through a rational, consistently applied set of regulations and procedures which promote the concept of multiple use management and ensure participation by the public, state and local governments, Indian Tribes, and appropriate Federal agencies.” Title 43 CFR also clarifies that RMPs are “designed to guide and control future management actions and the development of subsequent, more detailed and limited scope plans for resources and uses.”

The BLM understands that an amendment to an approved RMP is more effectively implemented if management decisions reflect the values and sentiment of the public. The first step in the BLM planning process is to identify issues from federal agencies; tribal, state, and local governments; and affected and interested public parties. These issues are identified during public scoping, a process intentionally conducted very early in the planning process to solicit comments and translate the information gathered into meaningful input for inclusion into the planning process and to guide the actions of the BLM.

The results of public scoping for the RMPA/EIS are summarized in this report. In addition, this report provides background information on the purpose and need for the RMPA/EIS, BLM’s Planning Area, and BLM’s collaborative planning process; description of the scoping process; explanation of the planning criteria developed to guide and direct the planning effort; a brief description of the data available for the studies and data needs; and a summary of the future steps in the planning process.

1.1.2 Purpose and Need for Amendment

An RMP provides a framework for managing resource areas for a period of 15 to 20 years. Periodically, RMPs are evaluated to determine if they continue to meet legislative and policy requirements, and land use and resource needs. If an RMP is found to be inadequate in these respects, one of three document preparations can be implemented as a remedy: (1) prepare a new plan; (2) revise the existing RMP; or (3) amend the existing RMP. The WRFO has determined that an amendment to the current RMP is necessary to address an unanticipated surge in the rate of oil and gas development.

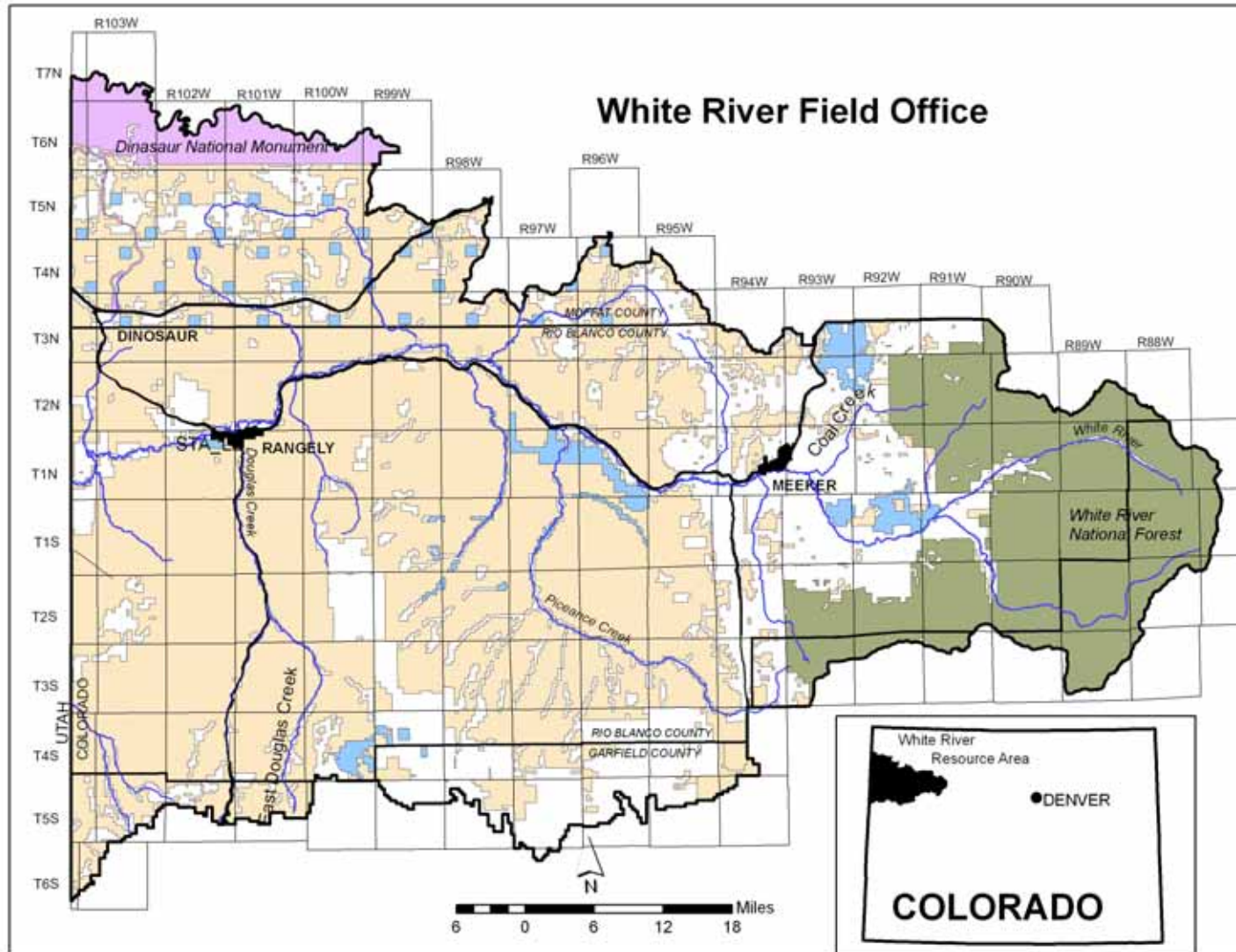
The Energy Policy and Conservation Act Reauthorization of 2000 directed the U.S. Department of the Interior (USDI) to produce a scientific inventory of several oil and gas basins in western states. The inventory identified the Piceance Basin of Northwest Colorado, in which the WRFO is located, as a sub-basin with large reserves of undeveloped oil and gas potential. The 1997 White River RMP projected and analyzed a Reasonable Foreseeable Development (RFD) scenario of 1,100 oil and gas wells, with 10 acres of disturbance per well, over a 20-year period. The RFD projected that nearly two-thirds of the development would take place south of Rangely, Colorado. Current and projected oil and gas activity in the Piceance Basin will soon far exceed the RFD analyzed in the 1997 RMP. Preliminary results from a revised RFD scenario being prepared by the BLM indicate that the potential exists to develop over 15,000 oil and gas wells in the Piceance Basin over the next 20 years.

1.2 PLANNING AREA

1.2.1 Location

The WRFO is located in northwest Colorado and incorporates parts of Rio Blanco, Moffat, and Garfield counties (see Map 1). The WRFO includes 2,675,300 acres of BLM, U.S. Forest Service (USFS), National Park Service (NPS), state, and privately-owned and administered lands. WRFO is located primarily in Rio Blanco County, with other tracts located in Garfield and Moffat counties, and encompasses 1,455,385 acres of BLM surface estate and 349,815 acres of split mineral estate. The planning area is a term that refers to federal and non-federal lands and interests in lands considered in the land use decisions and related environmental impacts. The planning area for the RMPA includes all lands within the boundary of the WRFO, which totals 2,675,300 acres. The decision area for the RMPA/EIS is all the lands within a planning area for which the BLM has authority to make land use and management decisions. In general, the BLM has jurisdiction over all BLM-administered lands (surface and subsurface) and over the subsurface minerals only in areas of split estate (areas where the BLM administers federal subsurface minerals, but the surface is owned by a non-federal entity, such as State Trust Land or private land). The decision area for this RMPA/EIS is 1,805,200 acres.

Map 1 - White River Field Office



1.2.2 Description

The WRFO is located in a high valley/mountainous continental climatic regime characterized by dry air, sunny days, and 10 to 20 inches of precipitation per year. The White River flows west to east through the WRFO, often providing a lush valley of irrigated farm land. Elevations range from 6,000 feet to 12,000 feet with three dominant geological elements present: the White River Uplift, the Piceance Basin, and the Douglas Creek Arch. The Piceance Basin where much of the anticipated increase in oil and gas activity will occur, is a 1,600-square-mile basin between the White River and the Colorado River extending 55 miles north-south and 35 miles east-west.

Dry, salt-rich soils support a sparse vegetation cover of salt tolerant shrubs, grasses, and cryptogamic lichens while approximately 46 percent of the WRFO involves a piñon-juniper association. Among the vertebrates, elk, pronghorn, deer, wild horses, grazing cattle, game and non-game birds, game and non-game fish, and a variety of sensitive species occupy the WRFO. The WRFO currently identifies six wilderness study areas (WSAs) with three of those recommended to the U.S. Congress for wilderness designation and the remaining three for other purposes in the WRFO. Five areas of critical environmental concern (ACEC) are currently designated by decisions made in the Piceance Basin Resource Management Plan (BLM 1987). Except for 15,560 acres, both on- and off-road motorized and non-motorized travel is permitted on all of the planning area. Cultural resources include historic, proto-historic, and Paleo-Indian and Archaic remains. Approximately 4,000 archaeological and historical sites have been recorded to date and it is anticipated that several thousand more remain to be identified (BLM 1997). About 116 paleontological resources sites are known to occur within the WRFO representing a fraction of actual sites discovered to date (BLM 1997). Numerous insect, fish, mammal, and dinosaur fossils have been inventoried.

1.3 COLLABORATIVE PLANNING

The term “collaboration” may be used to describe a wide range of external and internal working relationships. According to BLM Land Use Planning Handbook H-1601-1, Appendix A, collaboration implies that other federal agencies; tribal, state and local governments; and the public will be involved before (and in this instance, throughout) the planning process is officially initiated, rather than only at specific points stipulated by regulation and policy (BLM 2005). The collaborative process essentially allows the affected community to communicate to the BLM how public lands should be managed from the public’s perspective. The goal of the collaborative planning process is that communities and agencies work together to seek solutions with broad support regarding the future management of the public lands.

Agency coordination is important in a successful collaborative process for several reasons. First, early involvement with other federal agencies and tribal, state, and local governments establishes solid working relationships with each agency. Next, it builds trust and credibility among agencies that then can be transferred to the public. Finally, it helps ensure that the land use decisions developed by BLM are supported by, and conform to, other jurisdictions in any given area to the maximum extent possible.

Similarly, active participation by the public early in the process helps to ensure that the alternatives developed:

- Address the diversity of public interests;
- Build trust between BLM and the public;
- Create public understanding and acceptance of the eventual management decisions; and
- Develop a working relationship that will carry into the shared implementation of those management decisions.

1.3.1 Cooperating Agencies

Cooperating agency status provides a formal framework for governmental units—local, state, tribal, or federal—to engage in active collaboration with a lead federal agency to implement the requirements of NEPA. In principle, a cooperating agency shares the responsibility with the lead agency for organizing the planning process.

A cooperating agency is defined as any federal agency, other than a lead agency, that has jurisdiction by law or that has special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major federal action significantly affecting the quality of the human environment (40 CFR 1508.5). A state or local agency of similar qualifications or, when the effects are on an American Indian reservation, an American Indian tribe, may by agreement with the lead agency, become a cooperating agency. As outlined in 40 CFR 1501.6, each cooperating agency will:

- Participate in the NEPA process at the earliest possible time;
- Participate in the scoping process;
- Assume, on request of the lead agency, responsibility for developing information and preparing environmental analyses (this includes portions of the EIS where the cooperating agency has special expertise);
- Make available staff support, at the lead agency's request, to enhance the lead agency's interdisciplinary capability; and
- Normally use its own funds for efforts associated with participating in the RMP/EIS process; that is, the lead agency shall, to the extent available funds permit, fund those major activities or analyses it requests from cooperating agencies (potential lead agencies shall include such funding requirements in their budget requests).

A cooperating agency may, in response to a lead agency's request for assistance in preparing the EIS, reply that other program commitments preclude any involvement or the degree of involvement requested.

1.3.2 Agency Coordination/Consultation/Cooperation

BLM contacted key federal, state, county, and local agencies in September and November 2006 to initiate coordination, consultation, and collaborative efforts that will continue throughout the RMPA/EIS process. Agencies contacted and invited to be cooperators are listed in Table 1-1. As of February 2007, the following agencies have requested cooperating agency status: U.S. Army Corps of Engineers, U.S. Fish

and Wildlife Service, Colorado Department of Health and Environment/Air Pollution Control Division, Colorado Department of Wildlife, Moffat County, Rio Blanco County, Garfield County, Town of Meeker, and Town of Rangely. Other federal, state, and local agencies have communicated with the BLM, and may request cooperating agency status in the future.

**Table 1-1
Letters of Interest Sent to Potential Cooperating Agencies**

Agency Name	Title	Address
Federal		
USDI Fish and Wildlife Service, Western Colorado Field Office	Al Pfister Project Leader	764 Horizon Dr., Bldg. B Grand Junction, CO 81506
USDA Natural Resources Conservation Service	Elvin Jones NRCS Specialist	351 7 th St. Meeker, CO 81641
U.S. Geological Survey, Colorado Water Science Center	Paul Vonguerard Western Colorado Office Chief	764 Horizon Dr., Rm. 125 Grand Junction, CO 81506
USDA Forest Service, White River National Forest	Maribeth Gustafson Forest Supervisor	900 Grand Avenue Glenwood Springs, CO 81602
USDI National Park Service, Dinosaur National Monument	Mary Risser Superintendent	4545 E. Hwy. 40 Dinosaur, CO 81610
U.S. Army Corp of Engineers Sacramento District Colorado/Gunnison Basin Regulatory Office	Sue Nall Project Manager	Wayne N. Aspinall Federal Bldg. 400 Rood Ave., Rm. 142 Grand Junction, CO 81501
State of Colorado		
State of Colorado	Governor s' Office	200 E. Colfax Ave. Denver, CO 80203
Colorado Department of Public Health and Environment	Dennis Ellis Executive Director	4300 Cherry Creek Dr. S. Denver, CO 80246-1530
Colorado Department of Natural Resources	Mike King Deputy Director	1313 Sherman St., Rm. 718 Denver, CO 80203
Colorado Department of Transportation	Ed Fink Region 3 Transportation Director	222 S. 6 th St, No. 317 Grand Junction, CO 81501
Local		
Garfield County Garfield County	John Martin County Commissioner	108 8 th St. Glenwood Springs, CO 80601
Moffat County Natural Resources Department	Jeff Comstock Director	221 West Victory Way, Ste. 130 Craig, CO 81625
Rio Blanco County Board of Commissioners	Kim Cook Chairman	555 Main St. Meeker, CO 81641
Meeker Town Government	Steve Loshbaugh Mayor	345 Market St. Meeker, CO 81641
Rangely Town Government	Jeff Devere Town Planner	209 East Main St. Rangely, CO 81648
City of Craig	Don Jones Mayor	300 West 4 th St. Craig, CO 81625
Town of Dinosaur	Mayor	333 S. Stegosaurus Dinosaur, CO 81610
City of Rifle	Keith Lambert Mayor	202 Railroad Ave. Rifle, CO 81650

1.3.3 Tribal Consultation

1.3.4

BLM initiated discussions with American Indian tribes to provide planning and process information and determine concerns and issues as well as to extend the offer for cooperating agency status. Informal and formal efforts to implement mandatory consultation with Tribal Historic Preservation Offices also have been initiated. BLM will continue to conduct government-to-government communications with the American Indian tribes throughout the process. The following American Indian tribes were contacted in November 2006: Northern Ute Tribe; Shoshone Tribe (Eastern Band); Southern Ute Indian Tribe; and Ute Mountain Ute Tribe.

1.3.5 Public Interaction

Planning efforts were described for the public in a planning letter/newsletter prepared by the BLM and made available at the WRFO, the WRFO web site, and the three public scoping meetings (contained in Appendix).

1.4 SCOPING PROCESS

This section provides a description of the public scoping process, the techniques that were used to notify the public about their opportunity to be involved in scoping, and a brief summary of the public scoping meetings. Public scoping lasted for 30 days initially, with an extension of 75 days ending on September 30, 2006.

1.4.1 Scoping Announcements

Initiation of the RMPA/EIS process and the public scoping meetings were announced through the *Federal Register*, press releases, paid advertisements in the media, the Colorado BLM web site, and the WRFO web site, as described below.

Federal Register

The WRFO Oil and Gas RMPA/EIS public scoping process began with the publication in the *Federal Register* of BLM's NOI to amend the 1997 White River Record of Decision and Approved Resource Management Plan, prepare an RMPA/EIS, and conduct public scoping meetings. The NOI to initiate planning for the WRFO was published on June 14, 2006 (Vol. 71, No. 114, Page 34388, [CO-110]) (NOI contained in Appendix).

Web Site

BLM prepared news releases to introduce the project, announce the scoping period, and publicize the scoping meetings and their respective locations. The news releases were posted on the Colorado BLM web site and the WRFO web site (see BLM News Releases contained in the Appendix).

Media Releases and Public Service Announcements

An announcement regarding the public scoping process and the scoping meetings was issued in August 2006, to local and regional newspapers. The following newspapers printed the announcement (contained in Appendix) on the dates indicated:

- Rio Blanco Herald Times, August 24, 2006;
- Rifle Citizen Telegram, August 24, 2006;
- Grand Junction Free Press, August 25, 2006;
- Glenwood Post-Independent, August 25, 2006;
- Grand Junction Daily Sentinel, August 25, 2006;
- Craig Daily Press, August 28, 2006; and
- Vernal Express, August 30, 2006.

1.4.2 Public Scoping Meetings

BLM hosted three public meetings in September 2006 to provide planning and NEPA information to the public and agencies and allow them to identify issues and concerns to BLM. Public scoping and the scoping meetings were advertised on the BLM web site and through the local media. As summarized in Table 1-2, a total of 114 people attended, including BLM personnel. Meeker, Rangely, and Rifle, Colorado, were selected as the most appropriate meeting locations.

**Table 1-2
Public Scoping Meeting Dates, Locations, and Attendance**

Meeting Date	Meeting Location	Attendance
September 12	Meeker, CO	44
September 13	Rangely, CO	31
September 14	Rifle, CO	39
Total		114

At the beginning of each meeting, the BLM WRFO Manager provided an overview of the RMPA/EIS process (PowerPoint presentation slides contained in Appendix). Following the presentation, community members were encouraged to review maps and informational display boards arranged in stations around the meeting room. Members of the planning team were available at the stations to discuss interests related to the BLM's planning area and the RMPA/EIS process. Community members were encouraged to ask questions of BLM personnel.

Comment forms, newsletters, and maps of the planning area were available as handouts for attendees of all of the scoping meetings (comment form and newsletter contained in Appendix). BLM also invited attendees to submit comments in written formats in addition to the comment forms provided at the meetings, including letters and electronic mail (e-mail) messages. The WRFO will continue to engage community and agency participation throughout the RMPA/EIS process.

2.0 PLANNING CRITERIA

2.1 INTRODUCTION

Planning criteria were established early in the process to provide direction for the RMPA process; the criteria provide focus for data collection efforts, ensure compliance with legal mandates, and facilitate the decision-making process.

2.2 GENERAL PLANNING CRITERIA

The following planning criteria guide the development of the RMPA/EIS:

- The plan will be completed in compliance with the FLPMA (43 U.S.C. 1701 et seq.), pertaining to BLM lands. Actions must comply with all relevant laws, regulations, executive orders, and BLM manuals.
- The plan will establish the guidance upon which the WRFO will rely in managing the lands and resources under its jurisdiction.
- The planning process will incorporate analyses documented within an EIS in accordance with NEPA.
- Actions must be reasonable and achievable and must allow for flexibility where appropriate (e.g., adaptive management).
- Actions will be considered using an interdisciplinary approach.
- The planning team will work cooperatively with county and municipal governments; other federal agencies; tribal, state, and local governments; and affected and interested public parties. A process of collaborative public involvement and participation will continue throughout this effort.
- The amendment will recognize valid existing rights related to the use of the public land.
- The process will involve American Indian tribal governments as necessary/requested and will provide strategies for protection of cultural resources on public land.
- Every effort will be made to ensure that decisions are compatible with existing plans and policies of adjacent federal, tribal, state, and local lands (while recognizing that decisions must be made in conformance with relevant laws, regulations, and BLM management policies).

3.0 COMMENT SUMMARY

3.1 INTRODUCTION

Agencies and the general public submitted comments to BLM staff in the form of oral comments and handwritten comment forms submitted during the public scoping meetings, or via letter or e-mail to describe the issues and concerns that are most important to them. Submittals were received from various agencies, businesses, individuals, and special interest groups.

3.2 COMMENT COMPILATION

During public scoping, BLM received a total of 69 unique comments: 54 letters from individuals; 2 letters from affected federal and state agencies; 1 letter from a local community; 6 letters from interested businesses; 4 letters from organizations and special interest groups; 1 e-mail from a local county; and 1 e-mail message from an interested individual. Where form letters were received, a representative letter was analyzed (see Table 3-1).

The submittals received were organized and reviewed, and the comments were analyzed to identify the preliminary issues to be addressed during the preparation of the WRFO Oil and Gas RMPA/ EIS. Comments were entered into an electronic database that facilitates organization, sorting, and management of the comments in several different ways. Each submittal was coded to identify the submitter (e.g., agency, organization, group, or individual), geographic location of submitter, and type of issue. These issues and others identified by BLM and cooperating agencies will be used to guide the development of the RMPA/EIS.

**Table 3-1
Number of Submittals Received**

Entity	Number of submittals received
Federal agencies	1
American Indian Tribes	0
State of Colorado	1
County governments	1
Local governments	1
Businesses	6
Organizations and special-interest groups	2 1 (46 form letters) 1 (15,000+ form letters)
Individuals	55
Total	69

3.3 SUMMARY OF PUBLIC COMMENTS

The comments received during the scoping period are summarized in Section 3.3.1 and listed in Table 3-2. Comments were entered into an electronic database and coded as belonging to one of two issue categories and six broad topics that would be evaluated for analyses in the EIS. The following summary represents the values held by individuals, and in some cases, groups of individuals

3.3.1 Summary of Public Comments

Planning and NEPA Process

The public expressed concern regarding the scope of the decision that will be presented through this amendment as well as the range and scope of alternatives to be developed. In addition, the planning process is not well understood. The role of agencies and other interested parties and the input by affected entities was a concern voiced by those submitting comments. Finally, a focus on the level, adequacy, and comprehensiveness of impact analysis on all resources was stated.

Oil and Gas Development

Included in this category were comments regarding oil and gas development technologies, production technologies, and impacts of oil and gas development on other resources. The primary concern voiced was the need for a carefully planned development of an increased number of wells and implementation of appropriate best management practices (BMPs). The planning process should consider all positive and negative direct, indirect, and cumulative impacts of oil and gas development on the natural and human environment.

Air and Water Quality and Resources

Comments were received regarding degradation of air quality from increased resource production as well as the air quality effects on currently permitted uses. In addition, the need for adequate baseline air quality data and air quality modeling was expressed. The focus on detailed evaluation of direct, indirect, and cumulative impacts on air and water quality was a concern. Comments regarding the implementation and use of BMPs were also received.

Biological Resources

Comments were received regarding vegetation, noxious weeds, riparian areas, and fish, wildlife, and special status species. The comments focused on protection of biological resources, detailed analysis of direct, indirect, and cumulative impacts, and development of appropriate BMPs. In addition, the availability and quality of adequate data was a concern.

Wild Horse Management and Rangeland Management

The primary concern for wild horse management was in regards to the protection of wild horse populations. Comments regarding rangeland management focused on the impact to vegetation for livestock and wildlife.

Fire Management

Comments received for fire management were in regards to the implementation of appropriate BMPs.

Special Designations

Comments under this category included Wilderness Study Areas (WSAs), wilderness characteristics, and Areas of Critical Environmental Concern (ACECs). Comments focused on protecting these designated areas as well as appropriate designations of areas.

Cultural, Historic, and Paleontological Resources, and American Indian Concerns

The protection of resources was of primary importance in addition to the development of appropriate BMPs. Coordination with impacted communities was also a concern.

Recreation Management and Social and Economic Values

Primary concerns included evaluation of impacts to and implementation of appropriate BMPs for the recreation industry (e.g., hunting, tourism, and primitive recreation uses) Many of the same concerns expressed for recreation management were also relevant to the social and economic situation within the WRFO.

Lands, Utility Corridors, Rights-of-Way, Withdrawals, and Roads and Travel Management

Comments were received regarding the existing management of lands within the WRFO and impacts of increased oil and gas development on lands and the existing transportation network. Many comments focused on the implementation of appropriate BMPs for direct impacts to lands, the transportation network, and utility and ROW corridors. The availability of adequate data for a comprehensive analysis was also a concern.

Visual Resource Management

The preservation of the visual resources of the WRFO was of primary concern as well as the implementation of appropriate BMPs.

3.3.2 Listing of Public Comments

The following table provides a comprehensive listing, by issue category and topic, of actual comments received from various agencies, businesses, individuals, and special interest groups.

**Table 3-2
Issues Identified Through Public Scoping**

Issue or Topic Category	Issue Sub-Category	Issue Statement
ISSUE 1: Planning and NEPA	Planning and NEPA process	<ul style="list-style-type: none"> • The planning process is not well understood by the public • Confusion exists regarding scope of decision • Concern regarding adequacy of data for responsible decision making • Define stipulations versus conditions of approval • Clarify that oil and gas development can occur during RMPA/EIS process • Clarify role of RFD as not quantifying or limiting development • Make RFD and Analysis of the Management Situation (AMS) available as basis of decision • Level of detail for analysis should be thorough, but not overly detailed • What is role of Northwest Resource Advisory Council? • What is role of cooperating agencies? • What is role of other publics? • Will there be collaboration with local/rural government agencies? • Concern regarding range, scope, and creativity of alternatives • A revision to the RMP, as opposed to just an amendment of the WRFO RMP should be completed to provide for a full assessment of the impacts of oil and gas development on the multiple resources and uses of the planning area and consideration of alternatives to provide for true multiple use and sustained yield • The U.S. Environmental Protection Agency (EPA) recommends specific guidance for the development of the EIS (see EPA submittal) • The EPA recommends a broad range of alternatives • The EPA recommends that the RMPA provide specific requirements for future project-specific EISs • The EPA recommends a thorough discussion of direct and indirect impacts as well as cumulative impacts • The EPA recommends development of a well-developed geographic information system (GIS) data analysis program capable of generating maps indicating ideal locations for roads, wells, or other facilities • The EIS process should employ the best science and data to inform decisionmaking • Input from affected entities should be given proper weight in the EIS • The EIS needs to include unbiased and comprehensive cost-benefit analysis

Issue or Topic Category	Issue Sub-Category	Issue Statement
		<ul style="list-style-type: none"> • Strategies and practices to adapt to long-term drought and/or global warming should be thought out and articulated in the RMPA • BLM must strike a balance between many competing uses of the land • The BLM must comply with the terms and guidance of WO IM 2004-089. The IM is a baseline scenario to provide the mechanism to analyze the effects that discretionary management decisions have on oil and gas activity • Suggest adherence to 1624 Manual Supplemental Program Guidance for fluid minerals requiring consideration of mineral resources in the planning process and elevating mineral resources to an equal level with all other resource values • Ensure that the level of environmental analysis is sufficient to facilitate environmental analysis for future Applications for Permits to Drill (note that the BLM is required to complete processing of permits within 30 days)
ISSUE 2: Oil and Gas Development	Oil and gas development	<ul style="list-style-type: none"> • Concern regarding cumulative effects on environment • Concern that only an appropriate number of wells suitable for oil and gas development are installed • What is the extent of commercial development versus research development and demonstration? • Consider and use BMPs • Carefully plan development of up to 15,000 additional oil and gas wells • Negative impact on mule deer and elk population due to oil and gas development • Implement mitigation measures whenever possible • Direct adverse impacts include loss of habitat resulting from the footprint of the drill sites, fragmentation of habitat from roads and drill sites, and from installation and maintenance of well sites • Deer and elk will actively avoid areas of higher human activity • Indirect impacts will include game and vehicle collisions, erosion in disturbed areas, noise disturbance, animal displacement away from human activity, increased poaching near roads and drill sites, and decline in habitat quality due to invasive weeds • BLM must assess the direct, indirect, and cumulative impacts of the range of alternatives for managing oil and gas development on the other resources in the planning area, which include considering ways to avoid or minimize these impacts • The EIS must contain a thorough analysis of the cumulative impacts of increased oil and gas activities when added to those from reasonably foreseeable oil shale activities • BLM can meet its FLPMA obligations and drastically reduce the impacts of oil and gas development on the other natural resources of the public land by requiring responsible development, in terms of issuing leases, controlling the pace and scale of development, and imposing conditions of approval on existing leases

Issue or Topic Category	Issue Sub-Category	Issue Statement
		<ul style="list-style-type: none"> • Oil and gas development should be one piece of the many different uses of the BLM land • Concern regarding handling and disposal of produced water • Concern over handling of waste materials • Can drill cuttings be used as road paving materials? • The EPA recommends use of proper BMPs as well as monitoring, inspection, and maintenance • The EPA requests a paper documentation trail to determine what was monitored, inspected, maintained, and completed • The EPA recommends that a designated agency/entity be identified to monitor inspections and monitoring and that agency/entity be included in the Record of Decision • BLM should employ the management practices outlined in the Colorado Wildlife Outlines for Oil and Gas Development • BLM could allow year-round drilling in more areas taking into consideration modern drilling techniques and environmental BMPs • Some produced water will require evaporation in containment ponds so there should not be a mandatory stipulation for reinjection • BLM should fully consider the positive impacts of increased development in the WRFO management area • Consider the use of net disturbance as a metric for monitoring land use implementation • BLM should consider alternatives to the concept of phased development
	Oil and gas development technologies	<ul style="list-style-type: none"> • Development should be crafted using the latest data and technology regarding industrial development • Colorado Division of Wildlife (CDOW) suggested the following BMPs as standards in oil and gas well development: <ul style="list-style-type: none"> ○ Interim reclamation ○ Centralized facilities and water recycling and distribution ○ Directional drilling from multiple well pads ○ Noise mitigation ○ Travel management and planning ○ Remote well monitoring/telemetry ○ Staged and cluster development ○ Complete wildlife exclusion from reserve pits • Utility placement and planning • The RFD scenario should not impose absolute caps on development • BLM cannot deny development on a leasehold after federal oil and gas leases are issued without No Surface Occupancy (NSO) stipulations
	Impacts of oil and gas development on other resources	<ul style="list-style-type: none"> • Given the scope of the oil and gas development that will be considered for the WRFO, virtually all of the other resources in the Planning Area will be affected • Consider the impact of the oil and gas development on Dinosaur National Monument • The town of Meeker wants to know how close to the city limits drilling will occur

Issue or Topic Category	Issue Sub-Category	Issue Statement
		<ul style="list-style-type: none"> • Development of an air quality baseline and analysis report to document baseline conditions • Meet the requirements of applicable State Implementation Plans and ambient air quality standards and improve air quality in non-attainment areas • Establish an effective air quality monitoring program that could halt any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded
	Oil and gas production technologies	<ul style="list-style-type: none"> • Concern regarding impacts of rubblizing to extract gas before oil shale development • Suggestion to use smallest possible footprint • Suggestion to use closed-circuit drill rigs • Suggestion to use three-phase gathering with one central facility and multiple gathering stations • Note that corporations do practice smaller footprint ethic as well as directional drilling, tankless pads, three-phase gathering, water pipelines to replace truck hauling • Use best available technologies for production • Base EIS analyses on economically recoverable natural gas, not simply technically recoverable natural gas • Recognize that directional drilling technology cannot be used in every situation • Note that directional drilling is utilized when the geology of the field permits allowing multiple wells to be drilled from one pad • Include 10 acre downhole density and consider the impacts of such density in the EIS
TOPIC 1: Natural Resources	Air quality	<ul style="list-style-type: none"> • Degradation of air quality from increased resource production • Additive air quality effects of currently permitted uses • Air quality effects of Flat Tops Wilderness Area • Availability of baseline air quality data • Need for air quality monitoring program • Concern regarding haze effects on Meeker • Cumulative air quality effects—flare-off of sour gas and toxics from compressor plants and shale pilot plant • Seek to exceed Federal, State, and local air quality standards • Make a priority of air quality • Eliminate flare-off and two-stroke engine use on public lands • Analyze cumulative impacts of proposed actions with past, present, and reasonably foreseeable actions • Halt any actions that exceed air quality standards • Address issue of regional haze and degradation of viewshed • Address issue of significant air quality degradation and implement mitigation measures • Protect Class I and II airsheds • Consider contribution of nitrous oxide (NO_x), sulfur dioxide (SO₂), and volatile organic compounds (VOCs) and impose mitigation measures • BLM air quality modeling is inadequate, does not suffice for the required analysis of cumulative impacts on air quality for RMPA; does not include the likely impacts from commercial

Issue or Topic Category	Issue Sub-Category	Issue Statement
		<p>activities on the research development and demonstration preference right areas</p> <ul style="list-style-type: none"> • The EPA recommends that an assessment of current air quality conditions be conducted and that the EIS should disclose the reasonably foreseeable impacts of air pollution • The EPA recommends identification of best available technology for engines, rigs, fugitive dust control, flaring, venting • The EPA requests that greenhouse gas development be analyzed
	<p>Water quality and resources</p>	<ul style="list-style-type: none"> • Handling and disposal of produced water • Availability of fresh water for production • Impacts of additional oil and gas development on streams • Impose restrictions on oil and gas development to protect water resources • CDOW expressed concern over the potential for subsurface release of gases and drilling fluids in proximity to fault lines that could result in the escape of noxious materials to ground and surface waters • The EPA notes that any discharges of fill material into wetlands and other waters of the United States are subject to Clean Water Act (CWA) jurisdiction as regulated by the U.S. Army Corps of Engineers • The EPA recommends that all wetlands and surface waters be mapped within the analyses area • The EPA recommends that mitigation measures for protection of wetlands be included in the EIS and RMPA (see guidance provided by EPA) • The EPA recommends application of state-identified BMPs to reduce potential non-point sources of pollution • Detailed water quality parameters should be analyzed (see guidance in submittal) • The EPA recommends that the EIS evaluate storm water management • The EPA recommends that the constituents present in produced waters having a potential to adversely impact surface and groundwater be thoroughly evaluated in the EIS and monitored during the implementation of the potential projects • The EPA requests that the use of fracturing fluids to enhance product recovery be identified and evaluated and the prevention of spills of fracturing fluids be addressed • The town of Meeker wants to know how both water quality and quantity issues will be addressed

Issue or Topic Category	Issue Sub-Category	Issue Statement
	Vegetation and noxious weeds	<ul style="list-style-type: none"> • Protection of rare plant species • Control noxious/invasive weeds • The EPA recommends analyses of reclamation activities supportive of pre-existing land uses, including wildlife habitat; weed growth; and adverse impacts on State and BLM sensitive species • The EPA recommends that the EIS list the noxious weeds and exotic plants that occur in the resource area and provide a detailed strategy for prevention, early detection of invasion and control procedures for these species • Reseed disturbed areas with native seed
	Riparian areas	<ul style="list-style-type: none"> • The EPA recommends protection, improvement and restoration of wetlands and riparian areas as a high priority
	Fish, wildlife, and special status species	<ul style="list-style-type: none"> • Negative impacts on black-footed-ferret recovery efforts and/or areas • Loss of wildlife • Habitat fragmentation • Displacement of wildlife to poorer habitat • Impacts on wildlife • Availability of data to assess impacts on wildlife • Protect existing wildlife habitat • West Nile disease and sage-grouse in Moffat County • Install protections for wildlife • CDOW advocates balance between resource development and minimization of impacts on wildlife, especially sagebrush steppe ecosystem species such as greater sage-grouse and mule deer • Reclamation should focus on returning disturbed areas to productive forage as quickly as possible after disturbance of native species • Refrain from the use of any invasive plant species during reclamation • Evaluation and monitoring of reclamation should be required • Interim reclamation also should be a requirement of operators • Undertake offsite mitigation by obtaining forage-improvement project sites elsewhere • Re-establish historic alfalfa hay fields of Piceance Creek and Yellow Creek • There should be 3 acres of offsite mitigation for each 1 acre of onsite disturbance • Companies could set up a mitigation fund for habitat improvements in adjacent areas • Compensatory funds could be set up for CDOW to use at their discretion for habitat enhancement • Timing stipulations: Construction activities between December 1 and April 15 would negatively impact wintering mule deer and elk in the project areas; avoid • Fawning/Calving habitat and corridors: see data on CDOW Wildlife Resource Information Service (WRIS) maps for movement corridors; minimize human activities during these times of year

Issue or Topic Category	Issue Sub-Category	Issue Statement
		<ul style="list-style-type: none"> • Ensure that wildlife habitat corridors identified by other agencies are represented in the planning process • CDOW suggested that guidelines in the RMPA for greater sage-grouse be specifically identified by life history stage • The BLM should prohibit disruptive surface activities from December 16 through July 7 to ensure no disruptive surface activities occur from March 16 through April 14 in important sage-grouse habitats • CDOW requested NSO on mapped grouse habitat and no disruptive activities within 4 miles of lek locations • Colorado River cutthroat trout are State species of concern and cumulative small impacts on individual populations could have range-wide listing implications • Staged development should be considered as in aid in managing wildlife and habitats • The EPA recommends consideration of specific suggestions to prevent fragmentation of wildlife (see EPA submittal) • Designate Wildlife Habitat Management Areas to protect big game habitat • BLM planners should provide detailed analyses of impacts on wildlife • Use current project-level NEPA documents in determining areas of concern and species-specific mitigation in the RMPA • Provide for reasonable development of natural resources in a responsible manner that mitigates potential negative impacts on wildlife
	Wild horse management	<ul style="list-style-type: none"> • The town of Meeker wants to know if the wild horse population will be protected
	Fire management	<ul style="list-style-type: none"> • Prescribed fire and other vegetative treatments should be done with planning and consideration for both initial and long-term impacts
	Wilderness Study Areas (WSAs) and wilderness characteristics	<ul style="list-style-type: none"> • See Citizens Wilderness Proposal as documented in the environmental coalition letter • Oil and gas development should be excluded from or only permitted with NSO restrictions in the citizen-proposed wilderness areas, Special Recreation Management Areas (SRMAs), ACECs, and wildlife management areas (WMAs) proposed in the separate submissions of the environmental coalition • Maintain and enhance wilderness characteristics • No wilderness areas have been identified on maps I • Install protections for wilderness
	Areas of Critical Environmental Concern (ACECs)	<p>Designate following areas as ACECs:</p> <ul style="list-style-type: none"> • Oil Spring Mountain and Bitter Creek; SRMAs, which include East Douglas Creek WMA, Pinyon Ridge, Canyon Pintado/Big Ridge, Blue Mountain, and Skull Creek Rim; and Special Management Areas (SMAs), including Bull Canyon/Skull Creek. • Add Dragon Canyon and Bitter Creek to ACECs
	Geology <ul style="list-style-type: none"> • Paleontology 	<ul style="list-style-type: none"> • The EPA recommends a thorough description of geology, topography, soils and stream stability in terms of erosion activities

Issue or Topic Category	Issue Sub-Category	Issue Statement
	<ul style="list-style-type: none"> • Soils and stratigraphy 	<ul style="list-style-type: none"> • Protect paleontological sites • BLM should undertake an inventory of paleontological sites in the study area • BLM should implement an education program for citizens to better understand fragile resources
TOPIC 2: Cultural/Historical Resources Management	Cultural resources	<ul style="list-style-type: none"> • Protect historical and cultural resources • BLM should conduct an inventory of cultural sites within the study area • BLM should implement a program to better educate the public about fragile resources
	American Indian concerns	<ul style="list-style-type: none"> • The EPA requests close coordination with any potentially future impacted American Indian tribes
	Historical resources	<ul style="list-style-type: none"> • Protect historical and cultural resources
TOPIC 3: Management of Human Activities and Uses	Recreation management	<ul style="list-style-type: none"> • Loss of hunting access • Impacts on guided hunting • Impacts on out-of-state visitor experience • Decrease in quality of hunting experience • Include recommendations for SRMAs in BLM plans • Rio Blanco County is a hub for outdoor recreation and its economy reflects that • FLPMA requires BLM to inventory its lands and their resources and values, “including outdoor recreation and scenic values” (43 U.S.C. 1711(a)) • Primitive recreation should be identified and protected • FLPMA identifies “outdoor recreation” as a valuable resource to be inventoried and managed by BLM (43 U.S.C. 1711(a)) • Lands with wilderness characteristics provide opportunities for primitive recreation such as hiking, camping, hunting, and wildlife viewing • Noise impacts on recreation will be incurred from increased human activities at the well sites and from recreational use of gas development roads • There will be a substantial loss of primitive recreational experience if the naturalness and quiet of these lands are not preserved • BLM must manage public lands under the recreation opportunity spectrum • Increasing recreation pressure dictates the need to include more lands within recreation opportunity spectrum classes that protect the land’s undeveloped wild character; i.e., primitive and semi-primitive non-motorized recreation classes • The BLM Land Use Planning Handbook provides for the establishment of SRMAs and depending upon the anticipated use of each SRMA, the BLM should adopt different management strategies • Trophy-quality game hunting should be acknowledged and protected in this RMPA • BLM should use SRMA designations and the recreation opportunity spectrum classification to support appropriate use of natural resources in the amendment area, preserving

Issue or Topic Category	Issue Sub-Category	Issue Statement
		their special character while permitting local communities to continue to receive the resulting economic benefits <ul style="list-style-type: none"> • BLM should consider the SRMAs proposed by The Wilderness Society • The town of Meeker wants to know if areas open to drilling will still be open to public recreational use
	Other energy and minerals	<ul style="list-style-type: none"> • No comments
	Forestry	<ul style="list-style-type: none"> • No comments
	Rangeland management	<ul style="list-style-type: none"> • BLM should look at how oil and gas development will impact vegetation for livestock and wildlife
	Land and Realty, Utility Corridors, Rights-of-Way, and Withdrawals	<ul style="list-style-type: none"> • Need to retain oil shale stipulations on existing leases; RMPA cannot conflict • Why is most of area leased when there is no plan in place? • Uncertainty of impacts on split estate lands • Conflicts between surface and mineral owners • Incorporate clear language into RMPA stating that valid, existing rights will be protected and how these rights could be impacted, if at all • Recommend consideration of application of stipulations on individual sites rather than as a mandatory condition of all leases
TOPIC 4: Transportation and Access Management	Roads and travel management	<ul style="list-style-type: none"> • Concern regarding increased traffic from increased oil and gas production • Request for BLM to work with local agencies to improve roads • Request for BLM to improve transportation infrastructure prior to increasing traffic • Colorado Highway 13 Rifle to Rio Blanco needs passing lanes • Piceance Creek Road needs adequate roadbed • Increased public activity and recreation as a result of new roads and pipelines would negatively impact wildlife through associated human disturbance and habitat degradation • Close new roads or pipeline corridors to motorized travel • Use shuttle buses to transport crews for maintenance of rigs • Water roads to minimize fugitive dust • Generate transportation network and oil and gas development scenarios based on the multiple resources BLM is required to manage using reliable data and high-quality analysis • Limit the potential transportation and oil and gas network scenarios to those that achieve long-term protection of a region's many resources for multiple use • Limit illegal roads in the transportation system • Ensure roads are justified and managed • Ensure that each road is necessary for specified and defined uses • Calculate landscape fragmentation metrics for all road network and oil and gas development alternatives • Integrate transportation system fragmentation metrics results

Issue or Topic Category	Issue Sub-Category	Issue Statement
		<p>into management plan alternatives and use them as basis for selecting the preferred alternative</p> <ul style="list-style-type: none"> • Include a road-closure plan for unnecessary and damaging routes and define a mitigation plan to protect and improve habitat, core areas, and ACECs • Establish an adaptive management plan to ensure that the effects of the existing plan are monitored and that additional road closures, modifications to lease stipulations and conditions of approval, and other mitigation measures are completed if monitoring and additional data collection indicate that wildlife populations are negatively affected • BLM should address travel management on a landscape-wide basis by addressing the impacts of all roads in the Planning Area • BLM must apply a legal definition of roads in the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal “ghost roads” are not legitimized, and reclaim “ghost roads” • BLM must consider whether a route has negative impacts on sensitive or protected resources • 43 CFR 19.2(e) establishes that “an approved road that is suitable for public travel by means of four-wheeled, motorized vehicles intended primarily for highway use;” therefore, it is incumbent upon BLM to exclude “user created” routes from the inventory presented in the RMPA/EIS • BLM’s consideration of off-road vehicle (ORV) use should take into account its potential damage to resources and other uses, including exclusion of other users • BLM baseline maps must not legitimize illegally created routes • BLM should include a detailed closure and restoration schedule in the RMPA • BLM should include and implement a monitoring system • BLM should include and implement transportation education and outreach in the RMPA • BLM should follow the eight travel-planning principles detailed in the environmental coalition letter to ensure that only routes that truly serve a valid purpose for the public remain open • Concern regarding decrease or loss of access • The EPA recommends mitigation measures for water quality to include provisions for road inspection and maintenance (see EPA guidance in submittal) • The EPA recommends proper sizing and alignment of culverts • The EPA recommends thorough evaluation of any proposed road improvements, new road construction, and general right-of-way construction activities on the area • The EPA requests specific plans for addressing dust control • The EPA requests that environmental analyses of any gravel source used for road construction be conducted in association with the EIS

Issue or Topic Category	Issue Sub-Category	Issue Statement
		<ul style="list-style-type: none"> • The town of Meeker wants to know if the trails currently being developed by both the BLM and Meeker will be protected • All new road building should be kept to a minimum • Old, unused trails and two-track roads should be left unimproved and motorized use on those roads prohibited • Prohibit off-highway vehicle (OHV) proliferation • BLM needs more enforcement officers to deal with OHV use • An EIS should be prepared to address OHV use on BLM lands • Limit road use to designated trails • Gate oil and gas access roads and close them to recreational use
<p>TOPIC 5: Management for Aesthetic and Social Values</p>	<p>Social and economic values</p>	<ul style="list-style-type: none"> • Consider that local economies rely on wildlife viewing, hunting, and fishing • Consider big game as a community economic component • Distribution of revenues versus impact areas • Redistribution of Federal, State, and local funds to areas impacted • Consider positive economic impacts of increased development on job creation, royalties, severance taxes, sales taxes, and property taxes • Impacts of restrictive stipulations on local economies (boom-bust) • Impacts of seasonal stipulations on oil and gas recovery and/or economics • Need more affordable housing to accommodate influx of people associated with resource development • Need more land for development in land-locked Rangely • Negative impacts on tourism due to lack of hotel/motel space • Consider extensive and potentially devastating socioeconomic impacts • Increased population will lead to increased need for housing, which will lead to increased housing prices • Costs to communities from unmitigated environmental damage must be estimated and included in the benefit-cost analysis for expanded oil and gas development in the WRFO • Recognize big game as a community quality-of-life component • Recognize big game as a community aesthetics component • “Please, please, please – we (locals) need open ears and hearts to help us out” • Consider rural area needs • The EPA requests that environmental related socio-economic impacts on the local communities be addressed • The EPA requests that the EIS disclose and evaluate any environmental justice aspects associated with impacts on low-income rural communities by either the proposed project or the potential buildout for the reasonably foreseeable future • The town of Meeker is concerned that it’s multiple use character be protected • The town of Meeker wants the BLM to draft agreements

Issue or Topic Category	Issue Sub-Category	Issue Statement
		<p>with the energy companies in such a manner that a portion of the funds required of municipalities and counties to expand infrastructure would be required from the energy companies</p> <ul style="list-style-type: none"> • An oil company recommends that a chart representing costs of administering the mineral program and industry's financial contributions to local, State, and Federal treasuries (see Draft EIS for Roan Plateau Planning Area for an example) • Ensure that economic and social impacts are addressed for the no action alternative • Consider the impact of continued (previously leased rights) development under the no action alternative
	Visual resource management	<ul style="list-style-type: none"> • Ensure the long-term preservation of unique backcountry landscape • Address issue of regional haze and degradation of viewshed • Protect viewshed from Dinosaur National Monument • The EPA recommends evaluation of impacts on visual character and requires mitigation efforts to minimize associated impacts including interim and final reclamation work • The EPA requires analyses of light pollution and provision of mitigation measures
TOPIC 6: Integration of Management with Other Agency and Community Plans	County land use plans	<ul style="list-style-type: none"> • No comments
	Emergency services	<ul style="list-style-type: none"> • No comments
	U.S. Fish and Wildlife Service consultation	<ul style="list-style-type: none"> • No comments
	Colorado State Government Agencies	<ul style="list-style-type: none"> • No comments
Other Federal Agencies	<ul style="list-style-type: none"> • See EPA submittal for extensive discussion of EPA requirements for RMPA/EIS development 	

3.4 MANAGEMENT OF ISSUES

This section lists all of the comments in each issue or topic category organized under the following subheadings:

- Issues to be Resolved/Analyzed in this Plan
- Issues Beyond the Scope of this Plan
- Issues Resolved Through Policy or Administrative Action

The “**Issues to be Resolved/Analyzed in this Plan**” are issues that may help to guide the focus of the analysis.

The “**Issues Beyond the Scope of this Plan**” are issues that are beyond the scope of the RMPA/EIS process; for example, those that may refer to actions requested outside of the Planning Area or outside of the BLM’s planning jurisdiction.

The “**Issues Resolved Through Policy or Administrative Action**” are those that do not require a decision in the RMPA, but can be addressed immediately through administrative action by BLM. Examples would be the completion of ongoing cultural resources inventory within the Planning Area or development of a memorandum of understanding.

3.4.1 Issue 1: Planning and NEPA

Issues to be Resolved/Analyzed in this Plan

- The planning process is not well understood by the public.
- Confusion exists regarding scope of decision.
- There is concern regarding adequacy of data for responsible decisionmaking.
- Define stipulations versus conditions of approval.
- Clarify that oil and gas development can occur during RMPA/EIS process.
- Clarify role of RFD as not quantifying or limiting development.
- Make RFD and Analysis of the Management Situation (AMS) available as basis of decision.
- The level of detail for analysis should be thorough, but not overly detailed.
- What is the role of the Northwest Resource Advisory Council in this planning effort?
- What is the role of cooperating agencies?
- What is the role of other publics?
- Will there be collaboration with local/rural government agencies?

Issues Beyond the Scope of this Plan

- The EPA recommends creating a well-developed GIS data analysis program capable of generating maps indicating ideal locations for roads, wells, or other facilities.
- Strategies and practices to adapt to long-term drought and/or global warming should be thought out and articulated in the RMPA.
- A revision to the RMP, as opposed to just an amendment of the WRFO RMP should be completed to provide for a full assessment of the impacts of oil and gas development on the multiple resources and uses of the planning area and consideration of alternatives to provide for true multiple use and sustained yield.

Issues Resolved Through Policy or Administrative Action

- There is concern regarding range, scope, and creativity of alternatives.
- The U.S. Environmental Protection Agency (EPA) recommends specific guidance for the development of the EIS (see EPA submittal for details).
- The EPA recommends a broad range of alternatives.
- The EPA recommends that the RMPA provide specific requirements for future project-specific EISs.
- The EPA recommends a thorough discussion of direct and indirect impacts as well as cumulative impacts.
- The EIS process should employ the best science and data to inform decisionmaking.
- Input from affected entities should be given proper weight on the EIS.
- The EIS needs to include unbiased and comprehensive cost-benefit analysis.
- The BLM must strike a balance between many competing uses of the land in plan development.
- The BLM must comply with the terms and guidance of WO IM 2004-089. The IM is a baseline scenario to provide the mechanism to analyze the effects that discretionary management decisions have on oil and gas activity.
- There is suggestion for adherence to 1624 Manual Supplemental Program Guidance for fluid minerals requiring consideration of mineral resources in the planning process and elevating mineral resources to an equal level with all other resource values.
- Ensure that the level of environmental analysis is sufficient to facilitate environmental analysis for future Applications for Permits to Drill (note that the BLM is required to complete processing of permits within 30 days).

3.4.2 Issue 2: Oil and Gas Development***Issues to be Resolved/Analyzed in this Plan***

- There is concern regarding cumulative effects on the environment.
- Evaluate environmental consequences, as required by both FLPMA and NEPA.
- Provide objective estimates of the expected cumulative impacts on air and water resources, wildlife habitat, wilderness values, communities, and all other resources of the WRFO.
- BLM should look at how oil and gas development will impact vegetation/grazing for livestock and wildlife.
- BLM should employ the management practices outlined in the Colorado Wildlife Outlines for Oil and Gas Development.
- Require interim reclamation and immediate post-drilling restoration of land, including rigorous control of noxious weeds, such that any land not in use or needed for ongoing operations will be reclaimed.
- Oil and gas development should be one piece of the many different uses of the BLM land.
- There is concern regarding the handling and disposal of produced water.
- There is concern over the handling of waste materials.
- Can drill cuttings be used as road paving materials?

- The EPA recommends the use of proper best management practices (BMPs) as well as monitoring, inspection, and maintenance.
- Require the use of BMPs for oil and gas exploration and development.
- The EPA requests a paper documentation trail to determine what was monitored, inspected, maintained, and completed in relation to oil and gas development activities.
- BLM could allow year-round drilling in more areas taking into consideration modern drilling techniques and environmental BMPs.
- Some produced water cannot be reinjected due to subsurface geology and will require evaporation in containment ponds, so there should not be a mandatory stipulation for reinjection.
- Consider the use of net disturbance as a metric for monitoring land use implementation.
- Where appropriate, require directional drilling to permit oil and gas development while reducing surface impacts on important areas.
- BLM should consider alternatives to the concept of phased development.
- BLM should consider a phased development alternative.
- Analyze all sources of income for regional economic trends rather than relying solely on employment, which would dramatically overstate the importance of oil and gas industries to the local economy.
- BLM should fully consider the positive impacts of increased development in the WRFO management area.
- Why is most of area leased when there is no plan in place?
- There is uncertainty of the impacts on split estate lands.
- Incorporate clear language into RMPA stating that valid, existing rights will be protected and how these rights could be impacted, if at all.
- Recommend consideration of application of stipulations on individual sites rather than as a mandatory condition of all leases.
- Generate transportation network scenarios and oil and gas development scenarios based on the multiple resources the land management agency is required to manage using reliable data and high-quality analysis.
- Uncertainty of impacts on split estate lands.
- Conduct an analysis of the cumulative impacts that reasonably foreseeable oil shale development RD&D's could have on the resources of the WRFO when added to the increase in oil and gas development.

Issues Beyond the Scope of this Plan

- BLM should show concern for the public land by requiring responsible development, in terms of issuing leases, controlling the pace and scale of development, and imposing conditions of approval on existing leases.
- Designate the following proposed areas as closed to mineral material sales, fluid mineral leasing, and withdrawn from locatable mineral entry:
 - Pinyon Ridge
 - Canyon Pintado/Big Ridge
 - Blue Mountain

- Skull Creek Rim SRMA
- East Douglas Creek WMA
- Oil Spring Mountain and Bitter Creek ACECs
- Bull Canyon/Skull Creek SMA
- Prohibit any further development of oil and gas in the Planning Area.
- There are conflicts between surface and mineral owners.
- Conflicts between surface and mineral owners.

Issues Resolved Through Policy or Administrative Action

- Disallow leasing and require No Surface Occupancy (NSO) in ACECs, Special Recreation Management Areas (SRMAs), Special Management Areas (SMAs), Wildlife Management Areas (WMAs), and lands managed to wilderness characteristics.
- Coordination with local, State, and Federal agencies throughout development of EIS and RMPA.
- The EPA recommends that a designated agency/entity be identified to monitor inspections and monitoring and that agency/entity be included in the ROD.
- Need to retain oil shale stipulations on existing leases; RMPA cannot conflict.
- Incorporate clear language into RMPA stating that valid, existing rights will be protected and how these rights could be impacted, if at all.
- Why is most of area leased when there is no plan in place?

3.4.3 Topic 1: Natural Resources

3.4.3.1 Air Quality

Issues to be Resolved/Analyzed in this Plan

- Address air quality as required by FLPMA.
- Prepare an air quality baseline and analysis report.
- Seek to meet and exceed local, State, and Federal air quality standards.
- Analyze cumulative impacts of proposed actions with past, present, and reasonable foreseeable actions.
- Address the question of how prevention-of-significant-deterioration requirements can be met. The following Class I airsheds are located within approximately 100 kilometers of the WRFO RMPA Planning Area:
 - Mount Zirkel Wilderness
 - Flat Tops Wilderness
 - Eagles Nest Wilderness
 - Holy Cross Wilderness
 - Black Canyon of the Gunnison Wilderness
 - Maroon Bells-Snowmass Wilderness Area
 - West Elk Wilderness Area
 - Arches National Park

- Canyonlands National Park
- Rocky Mountain National Park
- Establish an effective air quality monitoring program that could halt any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.

Issues Beyond the Scope of this Plan

None identified in scoping.

Issues Resolved Through Policy or Administrative Action

- Development of an air quality baseline and analysis report to document baseline conditions.
- Meet the requirements of applicable state implementation plans and ambient air quality standards and improve air quality in non-attainment areas.

3.4.3.2 Water Quality and Resources

Issues to be Resolved/Analyzed in this Plan

- Discuss handling and disposal of produced water.
- Discuss availability of fresh water for production.
- Impose restrictions on oil and gas development to protect water resources.
- The town of Meeker wants to know how both water quality and quantity issues will be addressed.
- There is concern for impacts of additional oil and gas development on streams.
- Colorado Division of Wildlife (CDOW) expressed concern over the potential for subsurface release of gases and drilling fluids in proximity to fault lines that could result in the escape of noxious materials to ground and surface waters.
- The EPA recommends that mitigation measures for protection of wetlands be included in the EIS and RMPA (see guidance provided by EPA).
- The EPA recommends application of state-identified BMPs to reduce potential non-point sources of pollution.
- The EPA recommends that the EIS evaluate storm water management in relation to oil and gas development.
- Detailed water quality parameters should be analyzed (see guidance in EPA submittal).
- The EPA recommends that the constituents present in produced waters having a potential to adversely impact surface and groundwater be thoroughly evaluated in the EIS and monitored during the implementation of the potential projects.
- The EPA requests that the use of fracturing fluids to enhance product recovery be identified and evaluated and the prevention of spills of fracturing fluids be addressed.

Issues Beyond the Scope of this Plan

- The EPA recommends that all wetlands and surface waters be mapped within the analyses area.
- Ensure that all potential impacts on water quantity and quality are thoroughly considered.
- Analyses also should consider the demands that oil shale development may place on local water supplies.

Issues Resolved Through Policy or Administrative Action

- The EPA notes that any discharges of fill material into wetlands and other waters of the United States are subject to CWA jurisdiction as regulated by the U.S. Army Corps of Engineers.

3.4.3.3 Vegetation and Noxious Weeds***Issues to be Resolved/Analyzed in this Plan***

- Adopt non-waivable stipulations of NSO that protect rare plants and their pollinators, and provide an adequate buffer from the indirect effects of surface disturbance.
- Prohibit ground disturbance (including pipeline-related disturbance) in these NSO areas.
- Ensure that the BLM does not contribute to the need to list White River penstemon (White River beard tongue [*Penstemon scariosus albifluvis*]) under the Act.
- Discuss protection of rare plant species.
- Control noxious/invasive weeds.
- The EPA recommends analyses of reclamation activities supportive of pre-existing land uses, including wildlife habitat, weed growth, and adverse impacts on State and BLM sensitive species.
- The EPA recommends that the EIS list the noxious weeds and exotic plants that occur in the resource area and provide a detailed strategy for prevention, early detection of invasion and control procedures for these species as affected by oil and gas development.
- Reseed disturbed areas with native seed.
- Conduct additional rare plant inventory work.
- Protect rare plant populations throughout the planning process.

Issues Beyond the Scope of this Plan

- Designate ACECs and provide management adequate to conserve and recover threatened, endangered and protected plants.

Issues Resolved Through Policy or Administrative Action

- The BLM must formally conference with the U. S. Fish and Wildlife Service (USFWS) on Graham's penstemon (including effects on proposed critical habitat).
- The BLM must formally consult with the USFWS on potential impacts on Dudley Bluffs bladderpod and Dudley Bluffs twinpod that may result from the adoption of this RMPA.

3.4.3.4 Riparian Areas***Issues to be Resolved/Analyzed in this Plan***

- The EPA recommends protection, improvement and restoration of wetlands and riparian areas as a high priority.

Issues Beyond the Scope of this Plan

None identified in scoping.

Issues Resolved Through Policy or Administrative Action

None identified in scoping.

3.4.3.5 *Fish, Wildlife, and Special Status Species*

Issues to be Resolved/Analyzed in this Plan

- Establish an adaptive management plan to ensure that the effects of the existing plan are monitored and that additional road closures, modifications to lease stipulations and conditions of approval, and other mitigation measures are completed if monitoring and additional data collection indicate that wildlife populations are negatively affected.
- Discuss negative impacts on black-footed ferret recovery efforts and/or areas.
- Discuss loss of wildlife.
- Discuss impacts on wildlife. Discuss impacts on the Migratory Bird Treaty Act (MBTA) and migratory birds.
- Install protections for wildlife. Install protections for the MBTA and migratory birds.
- Provide for reasonable development of natural resources in a responsible manner that mitigates potential negative impacts on wildlife.
- Discuss habitat fragmentation.
- Displacement of wildlife to poorer habitat.
- Protect existing wildlife habitat.
- Staged development should be considered as in aid in managing wildlife and habitats.
- Wildlife habitat in the WRFO must be recognized, and most of all, protected through the RMPA.
- Protection of high-priority (habitat) linkage area.
- Protect historical and cultural resources, rare plant populations, and wildlife habitat throughout the planning area.
- CDOW advocates balance between resource development and minimization of impacts on wildlife, especially sagebrush steppe ecosystem species such as greater sage-grouse and mule deer.
- Reclamation should focus on returning disturbed areas to productive forage as quickly as possible after disturbance of native species.
- Refrain from the use of any invasive plant species during reclamation.
- Evaluation and monitoring of reclamation should be required.
- Interim reclamation also should be a requirement of operators.
- Timing stipulations: Construction activities between December 1 and April 15 would negatively impact wintering mule deer and elk in the project areas; avoid per CDOW.
- Fawning/Calving habitat and corridors: see data on CDOW WRIS maps for movement corridors. Minimize human activities during these times of year.
- Ensure that wildlife habitat corridors identified by other agencies are represented in the planning process
- CDOW suggested that guidelines in the RMPA for greater sage-grouse be specifically identified by life history stage.
- Colorado River cutthroat trout are State species of concern and cumulative small impacts on individual populations could have range-wide listing implications.

- The EPA recommends consideration of specific suggestions to prevent fragmentation of wildlife.
- Incorporate strategies from the Piceance/Parachute/Roan Local Working Group's sage-grouse conservation plan in the RMPA.
- Consult with the (USFWS) on black-footed ferret management, including necessary mitigations (especially leasing restrictions like stipulations of NSO) for oil and gas drilling.
- Consult with the USFWS on all listed species in the WRFO, and adopt adequate protections.
- Formally consult with the USFWS regarding impacts on the fish and their critical habitat.
- Provide for the needs of the listed Colorado River fish (razorback sucker, Colorado pike minnow, humpback chub, and bony tail chub). Take a "hard look" not only at direct effects on the fish, but also at indirect effects that may affect their waters, including dewatering and degradation of water quality.
- Seek advice from the USFWS, CDOW, and Trout Unlimited on mitigations warranted to protect Colorado River cutthroat trout.
- Ensure that white-tailed prairie dog management is consistent with the multi-state Conservation Assessment and Conservation Strategy recommendations.
- Adopt the measures outlined in Center for Native Ecosystems's "Recovering the White-tailed Prairie Dog and Its Habitat: Management Needs."
- Ensure that the RMPA employs the conservation strategies in the multi-agency (Trout) Conservation Agreement.
- Designate Wildlife Habitat Management Areas to protect big game habitat.
- Companies could set up a mitigation fund for habitat improvements in adjacent areas.
- There should be 3 acres of offsite mitigation for each 1 acre of onsite disturbance.
- Discuss West Nile disease and sage-grouse in Moffat County.
- Designate the nominated Coyote Basin (CO), Wolf Creek, and Coyote Basin white-tailed prairie dog ACECs.
- Implement the protective measures set out in the Blueprint for Sage-grouse Conservation and Recovery.
- BLM planners should provide detailed analyses of impacts on wildlife in relation to oil and gas development.
- Ensure that the WRFO employs the conservation strategies in the Colorado Statewide Greater Sage-grouse Conservation Plan.
- The BLM should prohibit disruptive surface activities from December 16 through July 7 to ensure no disruptive surface activities occur from March 16 through April 14 in important sage-grouse habitats.
- CDOW requests NSO on mapped grouse habitat and no disruptive activities within 4 miles of lek locations.
- Undertake offsite mitigation by obtaining forage-improvement project sites elsewhere.
- Protect wildlife habitat throughout the planning area.

Issues Beyond the Scope of this Plan

- Re-establish historic alfalfa hay fields of Piceance Creek and Yellow Creek.

- Compensatory funds could be set up for CDOW to use at their discretion for habitat enhancement.
- Close white-tailed prairie dog shooting year-round within the Wolf Creek Management Area (including the Colorado part of Coyote Basin).
- BLM should ensure that bald eagles along the Yampa are protected adequately.
- Integrate the results of fragmentation analysis into management plan alternatives and use them as the basis for selecting the preferred alternative.
- Calculate landscape fragmentation metrics for all road network and oil and gas development alternatives, guided by the best available science and supporting studies conducted in accordance with sound and objective scientific practices. Include, at a minimum, well-pad density, pipeline density, road density, road effect zones, and core areas. Metric parameters and the evaluation of results should be relevant to ecological conditions, species that are present and human uses of the landscape.

Issues Resolved Through Policy or Administrative Action

- Continue gathering data as availability of data to assess impacts on wildlife seems less than necessary.
- Use current project-level NEPA documents in determining areas of concern and species-specific mitigation in the RMPA.
- Assemble wildlife habitat use information to aid in NEPA analysis.
- The BLM must take special status species obligations seriously, and ensure that the RMPA meets the BLM's own guidance.

3.4.3.6 Wild Horse Management

Issues to be Resolved/Analyzed in this Plan

The town of Meeker wants to know if/how the wild horse population will be protected from adverse effects of oil and gas development.

Issues Beyond the Scope of this Plan

None identified in scoping.

Issues Resolved Through Policy or Administrative Action

None identified in scoping.

3.4.3.7 Fire Management

Issues to be Resolved/Analyzed in this Plan

None identified in scoping.

Issues Beyond the Scope of this Plan

None identified in scoping.

Issues Resolved Through Policy or Administrative Action

- Prescribed fire and other vegetative treatments should be done with planning and consideration for both initial and long-term impacts.

3.4.3.8 Wilderness Study Areas and Wilderness Characteristics

Issues to be Resolved/Analyzed in this Plan

- Maintain and enhance wilderness characteristics.
- Install protections for wilderness.
- Oil and gas development should be excluded from or only permitted with NSO restrictions in the citizen-proposed wilderness areas, SRMAs, ACECs, and WMAs proposed in the separate submissions of the environmental coalition.

Issues Beyond the Scope of this Plan

- See Citizens Wilderness Proposal as documented in the environmental coalition letter.

Issues Resolved Through Policy or Administrative Action

- No wilderness areas have been identified on maps.

3.4.3.9 Areas of Critical Environmental Concern

Issues to be Resolved/Analyzed in this Plan

None identified in scoping.

Issues Beyond the Scope of this Plan

- Designate following areas as ACECs:
 - Oil Spring Mountain and Bitter Creek; SRMAs, which include East Douglas Creek WMA, Pinyon Ridge, Canyon Pintado/Big Ridge, Blue Mountain, and Skull Creek Rim; and SMAs, including Bull Canyon/Skull Creek.
- Add Dragon Canyon to ACECs.

Issues Resolved Through Policy or Administrative Action

None identified through scoping.

3.4.3.10 Geology, Paleontology, and Soils and Stratigraphy

Issues to be Resolved/Analyzed in this Plan

- The EPA recommends a thorough description of geology, topography, soils and stream stability in terms of erosion activities in the EIS.
- Discuss protection of paleontological sites from increased development.

Issues Beyond the Scope of this Plan

- BLM should undertake an inventory of paleontological sites in the study area.

Issues Resolved Through Policy or Administrative Action

- BLM should implement an education program for citizens to better understand fragile resources.

3.4.4 Topic 2: Cultural/Historical Resources Management

3.4.4.1 Cultural Resources

Issues to be Resolved/Analyzed in this Plan

- Discuss protection of historical and cultural resources.
- BLM should determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore cultural resources.
- BLM's goal should be to protect, conserve, and where appropriate restore archaeological and historical sites and landscapes.
- BLM should outline specific management actions, such as stabilization, fencing, signing, closures, or interpretative development, to protect, conserve, and where appropriate restore cultural resources.
- Protect historical and cultural resources throughout the planning area.

Issues Beyond the Scope of this Plan

- BLM should complete a Cultural Resource Management Plan that seeks to provide for an appropriate proactive process of inventorying for cultural resources, making determinations of eligibility for the National Register of Historic Places, and seeking to nominate eligible properties to the National Register.
- BLM should survey all known or discoverable cultural and historic sites, or those adjacent sites may be adversely affected.

Issues Resolved Through Policy or Administrative Action

- BLM should adopt measures to protect cultural resources from artifact collectors, looters, thieves, and vandals.
- BLM should conduct an inventory of cultural sites within the study area.
- BLM should implement a program to better educate the public about fragile resources.

3.4.4.2 American Indian Concerns

Issues to be Resolved/Analyzed in this Plan

None identified through scoping.

Issues Beyond the Scope of this Plan

None identified through scoping.

Issues Resolved Through Policy or Administrative Action

- BLM should consult with the American Indian community to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance.
- The EPA requests close coordination between BLM and any potentially future-impacted American Indian tribes throughout the EIS process.

3.4.4.3 Historical Resources

Issues to be Resolved/Analyzed in this Plan

- Discuss protection of historical and cultural resources.

Issues Beyond the Scope of this Plan

None identified through scoping.

Issues Resolved Through Policy or Administrative Action

- Inventory historical and cultural resources in the study area.

3.4.5 Topic 3: Management of Human Activities and Uses

3.4.5.1 Recreation Management

Issues to be Resolved/Analyzed in this Plan

- Discuss loss of hunting access because of oil and gas development.
- What impacts will there be in guided hunting?
- Effects on trophy-quality game hunting should be acknowledged and protected in this RMPA.
- Will there be a decrease in the quality of the hunting experience?
- What impacts will there be on out-of-state visitor experiences?
- Rio Blanco County is a hub for outdoor recreation and its economy reflects that activity.
- FLPMA requires BLM to inventory its lands and their resources and values, “including outdoor recreation and scenic values” (43 U.S.C. 1711(a)).
- Primitive recreation should be identified and protected.
- There will be a substantial loss of primitive recreational experience if the naturalness and quiet of these lands are not preserved.
- Lands with wilderness characteristics provide opportunities for primitive recreation such as hiking, camping, hunting, and wildlife viewing.
- FLPMA identifies “outdoor recreation” as a valuable resource to be inventoried and managed by BLM (43 U.S.C. 1711(a)).
- Noise impacts on recreation will be incurred from increased human activities at the well sites and from recreational use of gas development roads.
- The BLM Land Use Planning Handbook provides for the establishment of SRMAs and depending upon the anticipated use of each SRMA, the BLM should adopt different management strategies.
- BLM should use SRMA designations and the recreation opportunity spectrum classification to support appropriate use of natural resources in the amendment area, preserving their special character while permitting local communities to continue to receive the resulting economic benefits.
- The town of Meeker wants to know if areas open to drilling will still be open to public recreational use.

- Categorize all public land as one of three categories for off-highway vehicle (OHV) use: (1) open; (2) limited to designated routes; or (3) closed.
- Provide specific areas that are limited to non-motorized recreation and to non-mechanized recreation.
- Ensure diverse recreational opportunities.
- Designate SRMAs and apply appropriate recreation opportunity spectrum classifications.
- Include recommendations for SRMAs in BLM plans.
- Increasing recreation pressure dictates the need to include more lands within recreation opportunity spectrum classes that protect the land's undeveloped wild character; i.e., primitive and semi-primitive non-motorized recreation classes.
- BLM should consider the SRMAs proposed by The Wilderness Society.

Issues Beyond the Scope of this Plan

- Designate the nominated Coyote Basin, Wolf Creek, and Coyote Basin white-tailed prairie dog ACECs.
- Designate Canyon Pintado as an SRMA and incorporate appropriate protections for this area's resources.
- Close white-tailed prairie dog shooting year-round within the Wolf Creek Management Area (including the Colorado part of Coyote Basin).

Issues Resolved Through Policy or Administrative Action

- Inventory recreation resource in the planning area and maintain this inventory on a continuing basis.
- Address recreation needs from a landscape perspective in travel-management planning.
- Manage public lands under the recreation opportunity spectrum.

3.4.5.2 Other Energy and Minerals

Issues to be Resolved/Analyzed in this Plan

None identified through scoping.

Issues Beyond the Scope of this Plan

None identified through scoping.

Issues Resolved Through Policy or Administrative Action

None identified through scoping.

3.4.5.3 Forestry

Issues to be Resolved/Analyzed in this Plan

None identified through scoping.

Issues Beyond the Scope of this Plan

None identified through scoping.

Issues Resolved Through Policy or Administrative Action

None identified through scoping.

3.4.5.4 Rangeland Management***Issues to be Resolved/Analyzed in this Plan***

- BLM should look at how oil and gas development will impact vegetation/grazing for livestock and wildlife.

Issues Beyond the Scope of this Plan

None identified through scoping.

Issues Resolved Through Policy or Administrative Action

None identified through scoping.

3.4.5.5 Land and Realty, Utility Corridors, Rights-of-Way, and Withdrawals***Issues to be Resolved/Analyzed in this Plan***

- Recommend consideration of application of stipulations on individual sites rather than as a mandatory condition of all leases to allow greater flexibility.

Issues Beyond the Scope of this Plan

None identified through scoping.

Issues Resolved Through Policy or Administrative Action

None identified through scoping.

3.4.6 Topic 4: Transportation and Access Management: Roads and Travel Management***Issues to be Resolved/Analyzed in this Plan***

- Concern regarding increased traffic on local communities from increased oil and gas production.
- Request for BLM to work with local agencies to improve roads in relation to oil and gas development.
- Request for BLM to improve transportation infrastructure prior to increasing traffic.
- Increased public activity and recreation as a result of new roads and pipelines would negatively impact wildlife through associated human disturbance and habitat degradation.
- Use shuttle buses to transport crews for maintenance of rigs.
- Water roads to minimize fugitive dust.
- Generate transportation network and oil and gas development scenarios based on the multiple resources BLM is required to manage using reliable data and high-quality analysis.
- Limit the potential transportation and oil and gas network scenarios to those that achieve long-term protection of a region's many resources for multiple use.
- BLM should include a detailed closure and restoration schedule in the RMPA for roads associated with oil and gas development.
- Concern regarding decrease or loss of access.

- The EPA recommends specific mitigation measures for water quality to include provisions for road inspection and maintenance.
- The EPA recommends proper sizing and alignment of culverts.
- The EPA recommends thorough evaluation of any proposed road improvements, new road construction, and general right-of-way construction activities on the area.
- The EPA requests specific plans for addressing dust control.
- The EPA requests that environmental analyses of any gravel source used for road construction be conducted in association with the EIS.
- The town of Meeker wants to know if the trails currently being developed by both the BLM and Meeker will be protected.
- All new road building should be kept to a minimum.
- Gate oil and gas access roads and close them to recreational use.
- BLM should address travel management on a landscape-wide basis by addressing the impacts of all roads in the Planning Area.
- BLM must apply a legal definition of roads in the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal “ghost roads” are not legitimized, and reclaim “ghost roads”.
- 43 CFR 19.2(e) establishes that “an approved road that is suitable for public travel by means of four-wheeled, motorized vehicles intended primarily for highway use;” therefore, it is incumbent upon BLM to exclude “user created” routes from the inventory presented in the RMPA/EIS.
- BLM’s consideration of off-road vehicle (ORV) use should take into account its potential damage to resources and other uses, including exclusion of other users.
- BLM should include and implement transportation education and outreach in the RMPA.
- Limit road use to designated trails.
- Old, unused trails and two-track roads should be left unimproved and motorized use on those roads prohibited.
- BLM needs more enforcement officers to deal with OHV use.
- Prohibit OHV proliferation.
- Close new roads or pipeline corridors to motorized travel.
- Limit illegal roads in the transportation system.
- Ensure roads are justified and managed.
- Ensure that each road is necessary for specified and defined uses.
- Include a road-closure plan for unnecessary and damaging routes and define a mitigation plan to protect and improve habitat, core areas, and ACECs.
- BLM should include and implement a monitoring system for roads and trails.
- BLM should follow the eight travel-planning principles detailed in the environmental coalition letter to ensure that only routes that truly serve a valid purpose for the public remain open.

Issues Beyond the Scope of this Plan

- An EIS should be prepared to address OHV use on BLM lands.

- Limit the potential transportation network and oil and gas infrastructure network scenarios to those that achieve long-term protection of the region's many resources for multiple uses.
- Calculate landscape fragmentation metrics for all road networks and oil and gas development alternatives.
- Integrate the results of fragmentation analysis into road management plan alternatives and use them as the basis for selecting the preferred alternative.
- BLM should use a legal definition of "road" when designating routes and exclude "user created" routes from the inventory.
- Include a road closure plan for unnecessary and damaging routes within the study area and define necessary mitigation to protect and improve habitat, core areas, and ACECs.
- BLM must consider whether a route has negative impacts on sensitive or protected resources.
- Categorize all public land as one of three categories for OHV use: (1) open; (2) limited to designated routes; or (3) closed.
- Colorado Highway 13 Rifle to Rio Blanco needs passing lanes if large vehicles from oil and gas development will be using it.
- Piceance Creek Road needs adequate roadbed before oil and gas construction and operations commence.
- Integrate transportation system fragmentation metrics results into management plan alternatives and use them as basis for selecting the preferred alternative.

Issues Resolved Through Policy or Administrative Action

- Complete a comprehensive travel management plan in a systematic and transparent manner in conjunction with the RMPA.
- Consideration of ORV use should take into account its potential damage to resources and other uses, including exclusion of other users.
- Include a detailed closure and restoration schedule in the comprehensive travel management plan.
- Include and implement education and outreach in the comprehensive travel-management plan.

3.4.7 Topic 5: Management for Aesthetic and Social Values

3.4.7.1 Social and Economic Values

Issues to be Resolved/Analyzed in this Plan

- BLM's socioeconomic analysis of the impacts of expanded oil and gas development should follow the approaches set out in the scoping briefs "Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy" and "The Economic and Social Impacts of Oil and Gas Development."
- BLM should use a Total Economic Valuation Framework for evaluating proposed oil and gas development projects. In general, when looking at the economic implications of the proposed development, BLM should do a full accounting of the costs and benefits. To facilitate informed investment decisions about publicly owned wildlands, economic analysis must take into consideration both market and non-market benefits and costs (Loomis 1993). To account for the full array of market and non-market wildland benefits, economists have derived the total

economic valuation framework. Total economic valuation framework is the appropriate measure to use generally when evaluating the benefits of conserving wildlands and wilderness character.

- As BLM develops its EIS for expanded oil and gas development in the White River Resource Area, it should base its analysis on economically recoverable natural gas, not simply technically recoverable natural gas.
- The BLM should avoid IMPLAN or other input-output models that are grounded in Economic Base Theory when estimating jobs and income for each alternative.
- There is a recommendation that the BLM use the Economic Profiling System (Sonoran Institute 2004) to assist in the socio-economic analysis.
- The NEPA analysis should be based on reasonable budget expectations, which should be clearly stated and the BLM must include a fiscal analysis of alternative implementation and mitigation costs.
- BLM needs to consider budget constraints when evaluating each management alternative as part of the NEPA process.
- The costs to communities from unmitigated environmental damage must be estimated and included in the benefit-cost analysis for expanded oil and gas development in the WRFO.
- To provide socio-economic context, the BLM should examine historic trends in county income and employment.

Issues Beyond the Scope of this Plan

- The scope of the BLM analysis should extend beyond the surrounding area.

Issues Resolved Through Policy or Administrative Action

- BLM should include and implement a monitoring system for maintenance of roads as well as for development of new non-authorized roads and/or trails within the study area.

3.4.7.2 Visual Resource Management

Issues to be Resolved/Analyzed in this Plan

- Ensure that scenic value is a resource that is conserved and establish clear management direction describing areas inventoried and possessing high scenic importance with clearly defined objectives that limit surface disturbance within important viewsheds, including:
 - Lands proposed for wilderness designation or with wilderness characteristics should be managed as Class I to “preserve the existing character of the landscape.”
 - Lands within popular and easily accessible vantage points should be managed for visual resources, such as visual resource management (VRM) Class II to “retain the existing character of the landscape,” including clear provisions dealing with oil and gas development and other human disturbance.
- Ensure the long-term preservation of unique backcountry landscape.
- Address issue of regional haze and degradation of viewshed.
- Protect viewshed as seen from Dinosaur National Monument.
- The EPA requires analyses of light pollution and provision of mitigation measures.

- The EPA recommends evaluation of impacts on visual character and requires mitigation efforts to minimize associated impacts including interim and final reclamation work.
- BLM should inventory visual resources, evaluate and update VRM classifications, and apply protective management for visual resources.

Issues Beyond the Scope of this Plan

None identified through scoping.

Issues Resolved Through Policy or Administrative Action

None identified through scoping.

3.4.8 Topic 6: Integration of Management with Other Agency and Community Plans

Issues to be Resolved/Analyzed in this Plan

- See EPA submittal for extensive discussion of EPA requirements for RMPA/EIS development.

Issues Beyond the Scope of this Plan

None identified through scoping.

Issues Resolved Through Policy or Administrative Action

None identified through scoping.

3.5 TYPES OF DECISIONS ANTICIPATED TO BE MADE

In accordance with FLPMA, BLM is responsible for management of public land and its resources based on the principles of multiple use and sustained yield. Development of the RMPA/EIS will be in accordance with the guidance set forth in the BLM H-1601-1, Land Use Planning Handbook.

Public land administered by the BLM WRFO is managed with direction from the RMP approved in 1997. Although the typical life-span of a RMP is 15 to 20 years, each warrants periodic evaluation. Since 1997, increases in requests for oil and gas leasing in the WRFO planning area have occurred in an unprecedented and unanticipated manner. This change requires reconsideration of certain management decisions. The RMPA/EIS will address specifically the recent surge in interest in oil and gas development in the Piceance Basin.

In addition to an analysis of direct and indirect impacts, an analysis of the cumulative impacts of proposed actions with past, present, and reasonable foreseeable actions will be performed. In accordance with the guidance established in the BLM H-1601-1, Land Use Planning Handbook, the analysis will provide adequate information to evaluate the cumulative impacts of each alternative in order to determine the best mix of potential planning decisions to achieve the identified goals and objectives.

3.6 EXISTING MANAGEMENT TO BE CARRIED FORWARD

BLM management decisions at the WRFO will continue to be based upon the approved 1997 White River RMP. Based on demonstrated experience, many elements of the existing RMP are adequate and remain valid, and BLM intends to carry these management decisions forward.

4.0 DATA

The WRFO staff has identified the data that are required to adequately address resource and use issues and develop and analyze impacts of plan alternatives. In many cases, existing resource information available in the WRFO will be used in formulating resource objectives and alternative management actions. Much of the data have been, or will be, updated, compiled, and converted into digital format (e.g., GIS) for use in the planning process and for development of resource maps for the plan. GIS files are the building blocks used to quantify resources, create maps, and manipulate information during formulation of the alternatives, especially during formulation of the preferred alternative. All GIS data developed for the RMPA/EIS will meet the data and metadata standards identified by BLM as appropriate. Continued scoping and coordination with other agencies will likely result in the identification of additional relevant data and may identify data gaps to be resolved during preparation of the RMPA.

5.0 SUMMARY OF FUTURE STEPS

The BLM planning process, a progression of nine basic steps, is presented below and described in the BLM planning regulations (43 CFR 1600: Manual 1617 [*Resource Management Plan Approval, Use, and Modification*], Section 42).

1. Identification of Issues

Issues were identified through the scoping process, which can be considered as the initiation of the overall planning process. The scoping process and the issues identified through the process are described and documented in this Scoping Report.

2. Development of Planning Criteria

Planning criteria establish constraints and guidelines for the planning process; establish standards, rules, and measures; set the scope of inventory and data collection; help identify the range of alternatives; and help estimate the extent of analysis. Based on the issues identified through the scoping process and in line with BLM management concerns, BLM drafted the planning criteria as described in Section 2.0 of this Scoping Report.

3. Data and Information Collection

Much of the data and information used will be extracted from existing data on file at WRFO and the BLM Colorado State Office, or will be otherwise obtained from other local agencies and academic institutions. Other data and information will be obtained from current BLM studies and through other relevant sources that can provide data to update and/or supplement BLM's data. The types of data used will include published and unpublished reports, maps, and digitally formatted data for use in a GIS. The RMPA/EIS process will address the above delineated resources, resource uses, and related issues.

During the data-collection step of the process, BLM will initiate specific coordination with agencies, including the USFWS for Section 7 consultation (under the Endangered Species Act) and the State Historic Preservation Officer for Section 106 consultation (under the National Historic Preservation Act), to ensure that these processes will be completed in conjunction with the RMPA/EIS process.

4. Analysis of the Management Situation

The AMS is a deliberate assessment of the current situation in the planning area. The documentation is a compilation of information appropriate to and commensurate with the planning issues. The AMS provides a profile of the existing condition of the environment, description of the existing management (e.g., laws, regulations, policies, management direction), and analysis of opportunities to continue or modify the existing management situation.

5. Formulation of Alternatives

BLM, in collaboration with relevant agencies and the public, will develop a range of reasonable alternatives (i.e., combinations of management strategies) to the existing management situation. These alternatives will (1) address the issues identified during scoping; (2) comply with BLM's planning regulations and policies; (3) comply with the FLPMA requirement to manage public lands according to the principle of sustained yield and multiple uses of the lands; and (4) comply with all other relevant laws and regulations. Also, an alternative that calls for no action will be addressed. The no-action alternative assumes that existing management will continue.

Formulation of alternatives is the most prominent milestone task for collaboration and public participation. Because the development of alternatives is a critical step for which careful and thorough collaborative planning is needed, BLM intends to schedule public meetings to discuss the alternatives for the planning area. The meetings will most likely be informal workshops with the general public, interested organizations, and agencies.

6. Estimation of Effects of the Alternatives

BLM then will assess the potential effects of the RMP alternative management strategies on the natural and cultural resources and the human uses of these resources.

7. Selection of the Preferred Alternative(s)

Based on the information generated in the previous step, the WRFO will identify and recommend to the BLM Colorado State Director a preferred alternative to amend the approved 1997 White River RMP. The Draft RMPA/EIS will be prepared and distributed to the public for review and comment for a period of 90 days. Public meetings will be scheduled during the comment period to provide an opportunity for discussion and public input. The availability of the Draft RMPA/EIS and public meetings will be announced via a notice in the *Federal Register*, various media, a planning bulletin, and on the project web site.

8. Selection of the Plan

Based on the scoping results and after thorough consideration of the public and agency comments regarding the Draft RMPA / EIS, the WRFO will recommend to the BLM Colorado State Director the Proposed RMPA and will publish the RMPA along with the Final EIS as one document (Proposed RMPA/FEIS). A final decision will be made after a 60-day Governor's Consistency Review and a simultaneous 30-day protest period. The Record of Decision and approved RMPA then will be published. The availability of the Proposed RMPA/FEIS will be announced via a notice in the *Federal Register*, various media, a planning bulletin, and on the project web site.

9. Monitoring and Evaluation

Over time, BLM will monitor and evaluate actions, resource conditions, and trends to determine the effectiveness of the RMPA and to ensure that implementation of the RMPA is achieving the desired results. The RMPA will be kept current through minor maintenance, amendments, or revisions as demands on resources change, as the resources change, or as new information is acquired.

The process requires the use of an interdisciplinary team of resource specialists to complete each step. The process also relies on an effective public involvement program so that the end result, the RMPA, will have community and political support. To achieve this, BLM is committed to continuing to engage the public and relevant agencies in the planning process. Land use planning often provides the catalyst for bringing communities, agencies, other groups, and individuals together to reach mutually beneficial goals. Over the past few years, BLM has incorporated collaborative approaches to planning and land stewardship projects. A collaborative approach to planning requires that BLM work together with other federal agencies; tribal, state, and local governments; and affected and interested public parties, from the earliest stages of, throughout, and beyond the planning process to address common needs and goals within the planning area. Collaboration increases community involvement with and support for management decisions and implementation—it establishes a long-term commitment by the participants for a shared responsibility and stewardship of the land. Based on the results of scoping, an assessment of the public's interest, and the need for participation at particular milestones of the planning process, the WRFO has prepared a Public Participation Plan to integrate public and agency involvement into and throughout the planning and environmental process.

6.0 REFERENCES

40 Code of Federal Regulations, Protection of the Environment.

43 Code of Federal Regulations, Public Lands: Interior.

Bureau of Land Management (BLM). 1987. *Piceance Basin Resource Management Plan Record of Decision*. U.S. Government Printing Office. Washington, D.C. 57 pp.

BLM. 1997. *White River Record of Decision and Approved Resource Management Plan*. July.

BLM. 2005. H -1601-1: *Land Use Planning Handbook*. March.

PUBLIC SCOPING MATERIALS

APPENDIX

Public Scoping Materials

Notice of Intent, published in the *Federal Register* on June 14, 2006 (Vol. 71, No. 114, Page 34388, [CO-110])

White River Field Office Oil and Gas RMPA/EIS, Planning Bulletin 1, September 2006

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