

DRAFT Resource Management Plan and Environmental Impact Statement Final Comment Analysis for the Kemmerer Field Office Planning Area



March 2008



Draft Resource Management Plan and Environmental Impact Statement Final Comment Analysis

FOR THE KEMMERER FIELD OFFICE PLANNING AREA



**U.S. Department of the Interior
Bureau of Land Management
Kemmerer Field Office, Wyoming**

March 2008

It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

TABLE OF CONTENTS

1.0	Introduction.....	1
2.0	Content Analysis Process	1
3.0	Summary of Public Responses to the Draft RMP/EIS	4
	Geographic Representation	4
	Organizational Affiliation	5
	Public Response Document Format and Method of Delivery	6
4.0	Analysis of Comments	6
5.0	Conclusion	13
	Appendix A – Public Response User’s Guide	
	Appendix B – Public Response Documents	
	Appendix C – Individual Comments and Responses	

LIST OF TABLES

Table 2-1.	Comment Topics	3
Table 3-1.	Geographic Representation of Respondents.....	4
Table 3-2.	Number of Responses per Affiliation.....	5
Table 3-3.	Number of Public Response Documents by Format	6

ACRONYMS AND ABBREVIATIONS

BLM	Bureau of Land Management
EIS	Environmental Impact Statement
NEPA	National Environmental Policy Act
NOA	Notice of Availability
RMP	Resource Management Plan
ROD	Record of Decision
WGFD	Wyoming Game and Fish Department

This page intentionally left blank.

1.0 INTRODUCTION

On July 13, 2007, the Bureau of Land Management (BLM) published a Notice of Availability (NOA) in the Federal Register announcing publication of the Kemmerer Field Office Draft Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS). This NOA initiated the beginning of a 90-day public comment period. The BLM accepted comments on the Draft RMP/EIS between July 13, 2007 and October 11, 2007. During the 90-day public comment period, the BLM hosted two open houses and three public meetings within the Kemmerer planning area to gather comments on the Draft RMP/EIS and to answer questions from the public. This report provides a summary of public comments received on the Draft RMP/EIS during the 90-day comment period. During this period, the Kemmerer Field Office received 61 public responses, including letters, comment forms, and public meeting testimony. Three public response documents (from the Uinta County Citizens Coalition, Gary-Williams Production Company, and the Office of the Governor) were received after the close of the comment period and are not considered in this report. The individual comments in these public response documents were similar to other comments received within the public comment period and therefore, may have already been addressed.

Although this report attempts to capture the full range of public issues and concerns, it should be used with caution. Respondents are self-selected; therefore, their comments do not necessarily represent the sentiments of the public as a whole. However, this summary does attempt to provide fair representation of the wide range of views submitted. In consideration of these views, it is important for the public and decision makers to understand that this process does not attempt to treat input as if it were a vote. Instead, the comment analysis process ensures that every comment is considered at some point in the decision process.

The remainder of this report is organized as follows:

- **Content Analysis Process** – Describes how the BLM receives, records, and categorizes response documents and comments.
- **Summary of Public Responses to the Draft RMP/EIS** – Provides an overview of response document demographics.
- **Analysis of Comments** – Outlines the parameters for substantive and non-substantive comments and provides a brief summary of comments and responses.
- **Appendix A: Public Response User's Guide** – A user's guide to assist respondents in identifying their response document, comments, and how the BLM responded.
- **Appendix B: Public Response Documents** – Copies of all response documents are included in this appendix.
- **Appendix C: Individual Comments and Responses** – Includes a table of individual comments and BLM responses organized by response document number, comment number, and summary comment number. Respondents can use the guide in Appendix A to identify their response document.

2.0 CONTENT ANALYSIS PROCESS

Comment content analysis for this document is defined as a systematic method of compiling, categorizing, and evaluating written comments made by individuals, federal and state agencies, Tribal governments, elected representatives, and other organizations on the Draft RMP/EIS in order to identify

substantive issues for review and response by the BLM decision makers. Additionally, through the content analysis process, BLM supplemented the project mailing list of respondents and compiled demographic information on the geographic distribution of respondents (see Section 3 of this report).

Public responses include oral testimony given at the public meetings and written responses postmarked or received via the project website within the 90-day public comment period. Methods of receiving responses included U.S. mail, e-mail, website submittals, and public meetings. All individuals attending public meetings were encouraged to submit responses in writing. Note that a public response document refers to the written submission or oral testimony from a respondent (e.g., letter, e-mail, etc.), whereas a comment refers to an identifiable expression of interest or issue statement included within a public response document. For example, a letter (i.e., public response document) received within the public comment period may contain one or more identifiable comments.

Analysis Process

Upon receipt of a public response, a member of the comment analysis team logged the response into a register, assigned a unique identifier, and converted the response to a searchable electronic (i.e., PDF) document. A team member then entered all pertinent respondent metadata (e.g., name, affiliation, address, and type of response) into a spreadsheet.

The first step in the analysis process is to identify and code individual comments within a public response. In accordance with the BLM's National Environmental Policy Act (NEPA) Handbook (H-1790-1), the team categorized each individual comment as substantive or non-substantive and assigned a numerical code to identify the type of comment as listed below. Comments that fall into categories 1 through 4 are considered substantive comments whereas categories 5 and 6 are non-substantive.

1. Comments on Inaccuracies and Discrepancies
2. Comments on the Adequacy of the Analysis
3. Comments Which Identify New Impacts, Alternatives, or Mitigation Measures
4. Disagreements With Significance Determinations
5. Personal Preferences
6. Other: Beyond the scope of this RMP/EIS, request for mailing list or copy of document, etc.

The team further categorized each comment by the topic that most closely captured the comment intent (e.g., Air Quality, Special Designations, Alternative A). The topics identified during this step of the process are shown in Table 2-1. Once all comments were coded, the BLM Interdisciplinary Team provided individual responses to all substantive comments. The comment analysis team then used the individual comments and responses to analyze, group, and summarize comments, and to write responses to summary comments.

The results of the comment analysis process are included in the appendices of this document. Appendix A includes a user's guide to assist respondents in finding their response documents and comments, Appendix B includes copies of all response documents, and Appendix C presents all individual comments, their associated codes, and individual responses.

Table 2-1. Comment Topics

Description	Description	Description
Implementation	Short-Term vs. Long-Term Productivity/Risks	Other Management Areas
Mitigation Measures	Multiple Physical Resources Management	National Historic Trails
Definition of Terms	Soils and Geology	Heritage and Visual Resource Management
Cumulative Impacts	Water Resources	Historic Resources
Appendices	Air Quality	Paleontological Resources
Out of Scope	Noise	Multiple Natural Resource/Management Activities
Mailing List/Copy DEIS	Visual Resources Management	Multiple Use Management
Editorial Corrections	Climate, Weather, and Atmospheric Processes	Ecosystem Management
Purpose and Need for Proposed Action	Biological Elements Management, General	Monitoring and Evaluation
Industry/Business Groups	Ecosystem/Habitat Composition and Function	Forested Vegetation Management
Public Involvement	Grassland/Shrubland	Late Successional/Old Growth
Outreach/Agency Communication Efforts	Riparian	Forest Health Management
Use of Public Involvement/Comment	Wildlife Management General	Noxious Weeds
Extension Needed	Wildlife Population Management	Insects and Disease
Collaboration with Other Government Entities	Terrestrial Wildlife and Habitat	Use of Pesticides and Herbicides
Other Federal Agencies	Fisheries and Aquatic Wildlife	Fire Management
State or Local Governments/Officials	Special Status Species (wildlife)	Role of Fire in Ecosystems
Relation to or Consistency with Other Plans, Directives, Etc.	Wildlife Structures	Prescribed Fire
Agency Rules and Regulations	Special Status Species (vegetation)	Domestic Livestock Management
Rules of Other Agencies	Transportation System Management (Infrastructure)	Livestock Grazing
Use of Science In Decision Making General	Roads Analysis	Fences, Water Troughs, Facilities
Best Available Science	Roads Infrastructure Management General	Mineral Resources Management
Funding, General	Motorized Routes	Leasable (Oil, Gas)
Funding for Implementation of Proposed Action	User-Created Roads and Trails	Directional Drilling
Alternatives General	General/Multiple Access	Leasable (Coal)
Alternative Development/Range	Recreation Management General	Locatable (Hardrock)
Alternative A	Motorized Recreation and Access General	Salable (Gravel, Rock, Etc.)
Alternative B	Mechanized Recreation	Communication Sites And Facilities
Alternative C	Non-Motorized, Non-Mechanized Recreation	Utility Corridors
Alternative D	Landownership	Utility Access and Rights-Of-Way

Table 2-1. Comment Topics (Continued)

Description	Description	Description
Relation to Laws, Act, Policies General	Land Exchanges and Disposal	Renewable/Wind Energy
Federal Laws, Acts, and Policies	Rights-Of-Way	Social Values Management (Includes Socio-Economic General)
NEPA	Special Land Designations General	Public Health And Safety
FLPMA	Other Special Designations	Economic Values Management
State Laws, Acts, and Policies	Wild and Scenic Rivers	Economic Contribution/Role of Agency-Administered Lands
Environmental Management General	Areas of Critical Environmental Concern	Local/Regional
Managing Ecosystem Integrity	Wilderness Study Areas	Tax Base and Payments to States

3.0 SUMMARY OF PUBLIC RESPONSES TO THE DRAFT RMP/EIS

This section provides a summary of the response demographics. Demographic analysis allows the BLM to form an overall picture of issues, as well as better understanding of who is submitting comments, the geographic distribution of respondents, their affiliations, and the format of the public responses.

The demographics presented below are based on public response documents received during the 90-day comment period. Note that separate comments are not treated as votes, and the outcome is not determined by a majority opinion. Every comment is considered individually. While demographic information can provide insight into public concerns, the comments are not a random representative sample of public opinion; therefore, the demographics presented in this report do not necessarily represent the opinions of society as a whole.

Geographic Representation

Geographic representation is tracked for each public response document received during the course of the public comment period. Table 3-1 identifies the origin of respondents filtered to the city and state of the respondent.

Table 3-1. Geographic Representation of Respondents

City	State	Number of Respondents
Oakland	California	1
San Diego	California	1
Boulder	Colorado	1
Denver	Colorado	8
Longmont	Colorado	1
Wilmington	Delaware	1
Idaho Falls	Idaho	1
Independence	Missouri	1

Table 3-1. Geographic Representation of Respondents (Continued)

City	State	Number of Respondents
Portland	Oregon	1
Logan	Utah	1
Provo	Utah	1
Salt Lake City	Utah	2
Washington D.C.	Washington D.C.	1
Casper	Wyoming	3
Cheyenne	Wyoming	5
Cokeville	Wyoming	2
Diamondville	Wyoming	1
Evanston	Wyoming	5
Jackson	Wyoming	1
Kemmerer	Wyoming	6
Laramie	Wyoming	3
Lonetree	Wyoming	1
Lyman	Wyoming	7
Unknown	Unknown	6

Organizational Affiliation

The BLM received responses from various organizations and unaffiliated individuals including local governments, preservation/conservation organizations, private industry, and unaffiliated individuals (Table 3-2). Only those public responses received on official letterhead, received through an official e-mail address, or announced during public testimony are considered as affiliated with an organization or government entity. All others are classified as unaffiliated individuals. Organization types were tracked for each comment document.

Table 3-2. Number of Responses per Affiliation

Affiliation	Number of Public Response Documents
Federal Agency	4
State Agency	6
Local Government	6
Non Governmental Organization	9
Private Industry	15
Unaffiliated Individual	21

Public Response Document Format and Method of Delivery

BLM received public response documents in various formats and through a variety of delivery systems. Table 3-3 identifies the number of documents received by format (e.g., e-mail, letter, website). All public response documents received were unique; no form letter responses were received during 90-day comment period.

Table 3-3. Number of Public Response Documents by Format

Response Document Format	Number
E-mail	3
Website	7
E-mail with a letter attached	5
Letter	36
Postcard	0
Comment Form	5
Public Hearing Testimony	5
Total	61

4.0 ANALYSIS OF COMMENTS

The BLM received 61 public responses to the NOA for the Kemmerer Draft RMP/EIS during the 90-day comment period. This section describes the categories of comments, summarizes like comments, and provides responses to comments. The 61 public responses received contained substantive and non-substantive comments. Representative non-substantive comments include requests to be added to the project mailing list, requests for a copy of the Draft RMP/EIS, personal preference or opinion, and comments which are outside the scope of the Draft RMP/EIS. Representative substantive comments generally relate to accuracy or adequacy of the analysis.

In accordance with the BLM's NEPA Handbook (H-1790-1), comments received on the Draft RMP/EIS are addressed in this report if they "are substantive and relate to inadequacies or inaccuracies in the analysis or methodologies used; identify new impacts or recommend reasonable new alternatives or mitigation measures; or involve substantive disagreements on interpretations of significance" (See 40 Code of Federal Regulation 1502.19, 1503.3, 1503.4, 1506.6, and 516 DM 4.17).

BLM's NEPA Handbook (H-1790-1) identifies the following examples of comment categories and appropriate responses (listed in Section 2.0 of this report).

- **Comments on Inaccuracies and Discrepancies.** Factual corrections should be made in the EIS in response to comments that identify inaccuracies or discrepancies in factual information, data, or analysis.
- **Comments on the Adequacy of the Analysis.** Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate may or may not lead to changes in the EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a

reevaluation of analytical conclusions. If, after reevaluation, the manager responsible for preparing the EIS does not think that a change is warranted, the response should provide the rationale for that conclusion.

- **Comments That Identify New Impacts, Alternatives, or Mitigation Measures.** If public comments on a draft EIS identify impacts, alternatives, or mitigation measures that were not addressed in the draft, the manager responsible for preparing the EIS should determine if they warrant further consideration. If they do, that official must determine whether the new impacts, new alternatives, or new mitigation measures should be analyzed in either: the final EIS; a supplement to the draft EIS; or a completely revised and recirculated draft EIS.
- **Disagreements with Significance Determinations.** Comments may directly or indirectly question determinations regarding the significance or severity of impacts. A reevaluation of these determinations may be warranted and may lead to changes in the EIS. If, after reevaluation, the manager responsible for preparing the EIS does not think that a change is warranted, the response should provide the rationale for that conclusion.
- **Expressions of Personal Preferences.** Comments that express personal preferences or opinions on the proposal do not require further agency action. They are summarized whenever possible and brought to the attention of the manager responsible for preparing the EIS. Although personal preferences and opinions may influence the final selection of the agency's preferred action, they generally will not affect the analysis.
- **Other.** In addition to the 5 categories from the NEPA Handbook described above, a sixth category named "other" was added for this report. Requests for copies of the Draft RMP/EIS, requests to be added to the project mailing list, and comments that are outside the scope of the project are classified as "other" comments. These comments are considered non-substantive and do not require further agency action.

A total of 1,522 individual comments were identified in the 61 response documents. Of these 1,522 comments, 934 comments were identified as substantive. Individual comments and agency responses are provided in Appendix C of this document. However, in an effort to provide a user-friendly method of understanding the broad themes or topics of concern expressed in the comments, the analysis team grouped individual comments with similar concerns and developed 24 summary comments and responses. The 24 summary comments and responses are presented below, and generally are organized by BLM resource program and other applicable categories (e.g., purpose and need). A summary comment that addresses several resource programs is listed under the heading Multiple Resource Programs.

PURPOSE AND NEED

Summary Comment #17: Respondents raised questions or requested clarification on the purpose and need as written for the Draft RMP/EIS as it relates to mineral resources.

Summary Response: As stated on Page 1-5, new data have become available, new policies have been established, and old policies have been revised. This, along with emerging issues and changing circumstances, resulted in the need to revise the existing plan. This section is not arguing that energy minerals development has become the priority use on public land. Rather, the Energy Policy and Conservation Act Reauthorization of 2000 coupled

with the Nation's growing demand for domestic energy is simply listed as an example of the many emerging issues and changing circumstances resulting in the need to revise the existing plan. See Page 1-5, New Data; Page 1-6 New and Revised Policy, and Page 1-7 Emerging Issues and Changing Circumstances.

AIR QUALITY

Summary Comment #1: A number of respondents submitted comments requesting a change, alteration or clarification of air quality (analysis, management action, or mitigation measure) or requested additional information.

Summary Response: The inter-agency air quality team (including air quality staff from Wyoming Department of Environmental Quality [Air Quality Division], U.S. Environmental Protection Agency, U.S. Forest Service, National Park Service, and BLM) collaborated on the “emissions-based” method used for the KFO RMP/EIS. Quantitative air quality analysis will be performed at the project level as necessary. BLM recognizes the primacy of the State of Wyoming in regulating air quality. Emission factors and parameters will be revised as necessary.

Summary Comment #24: A few of respondents submitted comments requesting a change, alteration or clarification concerning climate change/global warming (analysis, management action, or mitigation measure) or requested additional information.

Summary Response: Text regarding climate change/global warming has been added to the document where appropriate. The BLM Washington Office is currently in the process of preparing guidance to address the issue of climate change/global warming. However, this guidance has not been finalized, and thus does not appear in the Draft RMP/EIS. Once finalized, the Kemmerer Field will adhere to all applicable guidance.

SOIL and GEOLOGY

Summary Comment #19: Numerous respondents requested change, alteration, or clarification of soil or geology (analysis, management action, mitigation measure) or requested additional information regarding geologic hazards.

Summary Response: Mitigation measures protecting soil and geology resources were based on the best available information as referenced in Chapter 5 and federal laws, regulations, policies, and guidance. If needed, project level analysis will provide additional information. In most cases, the site-specific impacts will be identified during onsite reviews and will be analyzed in environmental documents pertaining to the specific action. Additional information or clarification will be provided in the Proposed RMP and Final EIS where appropriate.

WATER

Summary Comment #2: Numerous respondents requested change, alteration, or clarification of water resources (analysis, management action, mitigation measure) or requested additional information regarding water resources.

Summary Response: Mitigation measures protecting water resources were based on the best available information as referenced in Chapter 5 and federal laws, regulations, policies, and guidance. The BLM coordinates with the appropriate regulatory authority responsible for water quality in Wyoming (i.e., Wyoming DEQ).

MINERAL RESOURCES

Summary Comment #3: Respondents requested change, alteration, or clarification of salable and leasable minerals (analysis, management action, mitigation measure) or requested additional information regarding salable and (or) leasable minerals.

Summary Response: The Reasonable Foreseeable Development was the base document used for analysis of salable and leasable minerals in the Draft RMP/EIS. The document can be found at <http://www.blm.gov/rmp/kemmerer/>. Additional information or clarification will be provided in the Proposed RMP and Final EIS where necessary.

VEGETATION

Summary Comment #4: Respondents submitted requests to set standards, verify effectiveness of management activities, or clarify information regarding vegetation in the planning area.

Summary Response: The preferred alternative identifies a wide range of management actions to protect important habitat types throughout the planning area. A variety of tools, including fire, are used to meet habitat objectives. In addition, contiguous vegetation blocks were identified to manage further fragmentation of large, contiguous blocks of native habitat. Habitats are assessed by BLM and the Wyoming Game and Fish Department (WGFD) to determine if their condition supports wildlife objectives.

FISH AND WILDLIFE – WILDLIFE

Summary Comment #5: Some respondents commented on the need for additional information on big game, or clarification of potential discrepancies in alternatives or the analysis on big game.

Summary Response: The WGFD, a cooperator who participated in the preparation of the Draft RMP/EIS, is responsible for establishing herd objectives through a public process. Many of the management challenges to meeting herd objectives are outside BLM's authority to manage (i.e., intermingled land ownership, agricultural conversion, drought conditions, etc.). The BLM decided to produce mapping of all big game species combined because constraints are aligned with crucial winter range regardless of species. Moose, elk, pronghorn, and deer crucial winter range restrictions are in place from November 15 through April 30. The BLM will continue to consider your comment throughout the planning process.

SPECIAL STATUS SPECIES

Summary Comment #6: Numerous respondents requested a change, alteration, or clarification of special status species (analysis, management action, or mitigation measure), or they requested additional information regarding special status species.

Summary Response: This analysis considers numerous management actions to reduce indirect impacts to wildlife and wildlife habitat, including special status species. Mitigation measures protecting special status species were based on the best available information as referenced in Chapter 5 and federal laws, regulations, policies, and guidance. BLM maintains compliance with all federal laws and guidance.

HERITAGE RESOURCES

Summary Comment #21: Respondents expressed concern or requested additional information regarding cultural resources including National Historic Trails and (or) other historic resources.

Summary Response: Section 106 requires Federal agencies to take into account the effects of undertakings on historic properties and to accommodate historic preservation concerns through consultation among the agency and other parties with interests in historic properties potentially affected by undertakings. BLM completed a Class I Regional Overview prior to completion of the Draft RMP/EIS. Mitigation measures and management actions protecting heritage resources were based on the best available information as referenced in Chapter 5 and federal laws, regulations, policies, and guidance. BLM maintains compliance with all federal laws and guidance. The Proposed RMP and EIS will include additional clarification of National Historic Trails, including buffers and management levels.

LAND RESOURCES

Summary Comment #20: Respondents expressed concern or requested additional information regarding retention, disposal, exchange, or acquisition of land within the planning area.

Summary Response: The Kemmerer RMP revision undertakes to incorporate a land tenure adjustment strategy, in accordance with the Land Use Planning Handbook (H-1601-1), by specifically identifying all of the individual parcels potentially affected. Once identified in the RMP and as opportunities arise, these identified parcels can then be considered for adjustment using the available tools including sale, exchange, Recreation and Public Purposes, acquisition, withdrawal, etc. Prior to any action, site-specific analysis will be conducted and will consider public access and the natural and cultural resources on the land.

Summary Comment #9: Expression of interest in length of time it takes for completion of coordination processes of projects impacting BLM-administered lands (surface and mineral estate).

Summary Response: Any proposals for development on BLM-administered lands are subject to coordination and environmental review as appropriate and the review time varies with the project.

Summary Comment #10: Numerous respondents requested change, alteration, or clarification of livestock grazing management (utilization, management actions, mitigation measures) or requested additional information regarding livestock grazing. Some respondents expressed concern about an anti-livestock bias in the Draft RMP/EIS. Conversely, other commenters felt the prominence of grazing on public lands was too high.

Summary Response: The analysis considers numerous management actions to reduce impacts to livestock grazing. Mitigation measures for livestock grazing were based on the best available information as referenced in Chapter 5 and federal laws, regulations, policies, and guidance. BLM maintains compliance with all federal laws and guidance. Appropriate text in the Proposed RMP and Final EIS will include information addressing the

importance of appropriate grazing management practices as related to rangeland health.

Summary Comment #8: Respondents requested clarification of the use or management of motorized and mechanized recreation or travel management in the planning area, including snowmobiles. Respondents also included requests to change, alter, or clarify motorized recreation and general access.

Summary Response: Travel management areas and travel planning criteria will be defined in the Proposed RMP and Final EIS. Travel management areas are identified for development of travel management plans within 5-10 years of signing the Record of Decision for the revised RMP. Your comments will be considered at that time. A number of referenced documents as well as updated BLM policy will be considered during this process so the most up-to-date scientific data are used.

Summary Comment #7: Respondents expressed concern or requested additional information regarding Visual Resource Management (VRM) classifications in the planning area.

Summary Response: The purpose of visual resource management is to manage the quality of the visual environment and to reduce the visual impact of development activities while maintaining the viability of all resource programs. The inventory included visual quality, distance zones, and sensitivity of the landscape. See BLM Manual Handbook 8410-1 and Washington Office Information Bulletin No. 98-135 for further guidance.

SPECIAL DESIGNATIONS

Summary Comment #22: Numerous respondents requested change, alteration, or clarification of special designations in the planning area (analysis, management action, mitigation measure) or requested additional information. Special designations include Areas of Critical Environmental Concern (ACECs), Research Natural Areas (RNAs), Wild and Scenic Rivers (WSRs), Wilderness Study Areas (WSAs), and Back Country Byways (BCBs).

Summary Response: A full range of alternatives were developed and considered. Special designations may constrain or encourage select resource uses in order to conserve resource values. Mitigation measures and management actions intended to protect resource values within special designation area boundaries were based on input from the public and the best available information as referenced in Chapter 5 and federal laws, regulations, policies, and guidance. The BLM will continue to consider you comment throughout the decision making process.

SOCIAL AND ECONOMIC CONDITIONS

Summary Comment #23: Respondents request a change, alteration, clarification, or broadening of the socio-economic impact analysis.

Summary Response: BLM recognizes the importance of quantifying non-market values when appropriate; however, this type of analysis is beyond the scope of this effort. BLM also recognizes the socio-economic impact/value of resources such as oil and gas is a function of where those resources are found. Estimates for social and economic impacts for the Draft RMP/EIS were analyzed using the best available data and applicable modeling methods.

MULTIPLE RESOURCE PROGRAMS

- Summary Comment #11:** Respondents submitted comments beyond the scope of the current document or expressed personal preference or opinion regarding alternatives, resources, or mitigation measures.
- Summary Response:** After review and careful consideration, the BLM has determined that your comment represents personal preference or opinion, or is outside the RMP's scope. Changes to the Kemmerer Draft RMP/EIS related to your comment will not be made at this time. The BLM will continue to consider your comment throughout the decision making process.
- Summary Comment #12:** Commenter requests a clarification of terminology, a correction in language or grammar, or a reevaluation of a section of text for accuracy.
- Summary Response:** Requests will be evaluated on an individual basis and text will be clarified or corrected as appropriate in the Proposed RMP and Final EIS.
- Summary Comment #13:** Some respondents requested verification that the recommendations set out in the document are in compliance with applicable laws, acts, regulations, policies, plans, directives, standards, or guidelines.
- Summary Response:** BLM complies with all applicable laws, policies, and regulations. All recommendations are taken into consideration and evaluated with relevant documents. Language and management actions will be reviewed and corrected, as appropriate, to ensure compliance with applicable laws, acts, regulations, policies, plans, directives, standards, or guidelines in the Proposed RMP and Final EIS. Lists of new and revised policies will be amended as appropriate for the Proposed RMP and Final EIS.
- Summary Comment #14:** Respondents requested the inclusion or adoption of additional baseline information (such as more data or a map); provisions or data from reports, guidelines, or recommendations; expressed concern over effectiveness of mitigation measures; or requested to implement specific mitigation measures.
- Summary Response:** BLM considered and incorporated baseline information including peer-reviewed, relevant scientific literature where applicable. Mitigation measures were based on the best available information and federal laws, regulations, policies, and guidance. A wide range of reasonable mitigation measures are included in each alternative as management actions, including measures suggested by individuals and organizations in their scoping comments. Upon completion of the Kemmerer RMP revision, an implementation strategy will be developed. This process occurs after the Record of Decision and is not a part of the Draft RMP/EIS. However, the BLM will continue to consider your comment throughout the decision making process.
- Summary Comment #15:** Respondents requested to broaden or alter the scope of the cumulative impacts analysis, range of alternatives, or requests to widen the overall scope of the EIS.
- Summary Response:** The Federal Land Policy and Management Act requires that BLM manage public lands and resources in accordance with the principles of multiple use and sustained yield, including recognizing the Nation's need for domestic sources of minerals, food, timber, and fiber. With that in mind, a full range of alternatives were developed and analyzed. BLM took extensive measures to ensure the scope, content, and analysis of

cumulative impacts was thorough and appropriate for resources and resource uses potentially affected by the actions proposed in the document. However, the BLM will continue to consider your comment throughout the decision making process.

Summary Comment #16: Respondents requested change, alteration, or clarification of surface-disturbing activities (analysis, management action, mitigation measure), or requested additional information regarding surface-disturbing activities.

Summary Response: BLM strives to minimize all surface-disturbing activities. The preferred alternative minimizes activities on areas sensitive to surface disturbance. Appendix M discloses the amount of anticipated surface disturbance for each activity. Where avoidance is not possible, additional mitigation would be employed.

Summary Comment #18: Some respondents raised questions or requested clarification on the public participation/coordination process.

Summary Response: The BLM published the Notice of Intent in the Federal Register on June 16, 2003, and issued a scoping notice to initiate a 30 day scoping period for the purpose of informing potentially affected parties of the intent to revise the Kemmerer Field Office RMP/EIS and to solicit input regarding identification of potential issues and alternatives; however, the revision scoping period remained open for 5 months. The BLM appreciates your comments and will consider them during preparation of the Proposed RMP/Final EIS.

5.0 CONCLUSION

In summary, respondents voiced a range of concerns relative to the revision process and land management issues. The most frequently discussed topics in the public comments were special status species, mineral resources, and livestock grazing.

This page intentionally left blank.