
Chapter 6

Consultation and Coordination

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CHAPTER 6

CONSULTATION AND COORDINATION

6.1 CHANGES BETWEEN THE DRAFT EIS AND FINAL EIS

Changes to this chapter between the Draft EIS and Final EIS are as follows:

- Expanded discussion of Native American and cooperating agency coordination;
- Added discussion of public comment period and summary of public comments;
- Updated, as appropriate, based on public comments received on the DEIS.

6.2 INTRODUCTION

This chapter describes the public outreach and participation opportunities made available through the development of this RMPA/EIS and consultation and coordination efforts with tribes, government agencies, and other stakeholders. This chapter also lists the interdisciplinary team of staff who prepared the RMPA/EIS.

The BLM land use planning activities are conducted in accordance with requirements of the NEPA, CEQ regulations, and BLM policies and procedures implementing NEPA. The NEPA and associated laws, regulations, and policies require the BLM to seek public involvement early in and throughout the planning process to develop a reasonable range of alternatives to proposed actions and to prepare environmental documents that disclose the potential impacts of proposed actions and alternatives. Public involvement and agency consultation and coordination, which have been at the heart of the planning process leading to this draft RMPA/EIS, were achieved through *Federal Register* notices, public and informal meetings, individual contacts, media releases, and the Greater Sage-Grouse Planning Strategy project website (<http://www.blm.gov/wo/st/en/prog/more/sagegrouse/western.html>).

6.3 CONSULTATION AND COORDINATION

Federal laws require the lead agency to consult with certain federal and state agencies and entities and Native American tribes (40 CFR, Part 1502.25) during the NEPA decision-making process. Federal agencies are also directed to integrate NEPA requirements with other environmental review and consultation requirements to reduce paperwork and delays (40 CFR, Part 1500.4-5).

In addition to formal scoping (**Section 6.5.1**, Scoping Process), the BLM implemented an extensive collaborative outreach and public involvement process that has included coordinating with cooperating agencies, holding public scoping meetings, conducting a socioeconomic workshop, and holding seven public comment meetings following publication of the DEIS. The BLM continued to meet with interested agencies and organizations throughout the planning process, as appropriate, and also continued coordinating closely with cooperating partners.

6.3.1 Native American Tribal Consultation

The BLM began tribal consultation by requesting a meeting with area tribes to discuss the details of the GRSG planning efforts. The BLM State Director initiated the consultation in a letter in the fall of 2011. The Director followed up this letter to the tribes during the following time frames:

- Summer 2012, expressing interest in meeting with tribes and initiating government-to-government consultation
- Summer 2013, an update on the planning process and initiating government-to-government consultation
- Fall/winter 2014, expressing interest in meeting with tribal representatives to discuss the draft Proposed Plan

In addition to sending the letters, BLM Vale District staff held meetings with the Fort McDermitt Paiute Tribe in 2014; on February 10, 2015, the BLM Prineville District Manager and GRSG project staff met with the Confederated Tribes of the Warm Springs.

Each of the tribes was also invited to participate in planning as cooperating agencies. The list of tribes contacted is detailed in **Table 6-1**, Cooperating Agencies.

6.3.2 Oregon State Historic Preservation Officer Consultation

The draft RMPA/EIS was provided to the Oregon State Historic Preservation Offices (SHPO) concurrently with its release to the public. The Proposed Plan RMPA/FEIS will also be provided the SHPO.

6.3.3 US Fish and Wildlife Service Consultation

Consultation with USFWS is required under Section 7(c) of the ESA prior to initiation of any project by the BLM that may affect any federally listed or

endangered species or its habitat. This RMPA process is considered to be a major project, and the Proposed RMPA/Final EIS defines potential impacts on threatened and endangered species as a result of management actions proposed in the alternatives. The USFWS is a cooperating agency in this planning process, and USFWS staff has participated in interdisciplinary team meetings and has been provided drafts of alternative decisions and analyses for discussion and input.

On October 22, 2013, the BLM sent a letter to the USFWS listing the species the BLM intended to assess. The USFWS response letter dated November 13, 2013 confirmed this list and recommended adding North American wolverine, Yellow-billed cuckoo, and Columbia spotted frog to the biological assessment. Over the ensuing months, regular meetings and coordination efforts were held to address which actions could affect those species and determine whether the implementation of the Proposed Plan “may affect” the species.

In May 2015, the BLM notified the USFWS it had completed the biological assessment (**Appendix W**, Biological Assessment Summary), with the determination of “no effects” to Federally listed and proposed species and designated and proposed critical habitat.

6.4 COOPERATING AGENCIES

A cooperating agency is any federal, state, or local government agency or Native American tribe that enters into a formal agreement with a lead federal agency to help develop an environmental analysis. More specifically, cooperating agencies “work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks” (BLM 2005d).

On December 7, 2011, the BLM wrote to 35 local, state, federal, and tribal representatives, inviting them to participate as cooperating agencies for the Oregon Greater Sage-Grouse Sub-Region RMPA/EIS. Twelve agencies agreed to participate on the EIS as designated cooperating agencies, all of which have signed MOUs with the BLM (**Table 6-1**, Cooperating Agencies). Some agencies are participating as cooperating agencies under the larger umbrella of the national-level MOUs described below.

The Forest Service, USFWS, and NRCS are participating in the EIS process as cooperating agencies at a national, regional, and sub-regional level; all agencies have signed MOUs, which outline roles and responsibilities at each organizational level.

**Table 6-1
Cooperating Agencies**

| Agencies and Tribes Invited to be Cooperators | Agencies that Accepted | Agencies that Signed MOUs |
|--|-------------------------------|----------------------------------|
| Counties | | |
| Baker County | | |
| Crook County | X | X |
| Deschutes County | X | X |
| Gillam County | | |
| Grant County | | |
| Harney County | X | X |
| Jefferson County | | |
| Klamath County | | |
| Lake County | X | X |
| Malheur County | X | X |
| Morrow County | | |
| Sherman County | | |
| Umatilla County | | |
| Union County | | |
| Wallowa County | | |
| Wasco County | | |
| State Agencies | | |
| Governor's Natural Resources Office | | |
| Oregon Department of Agriculture | | |
| Oregon Department of Economic Development | | |
| Oregon Department of Energy | | |
| Oregon Department of Environmental Quality | | |
| Oregon Department of Fish and Wildlife | X | X |
| Oregon Department of Forestry | | |
| Oregon Department of Geology and Mineral Industries | | |
| Oregon Department of Land Conservation/Development | | |
| Oregon Department of Transportation | | |
| Oregon Division of State Lands | | |
| Oregon Water Science Center | | |
| Oregon State Parks and Recreation Department | | |
| Oregon State University | X | X |
| Federal Agencies | | |
| Bureau of Reclamation | | |
| Federal Energy Regulatory Commission | X | X |
| Federal Highway Administration | | |
| Natural Resources Conservation Service | X | X |
| US Army Corps of Engineers | | |

**Table 6-1
Cooperating Agencies**

| Agencies and Tribes Invited to be Cooperators | Agencies that Accepted | Agencies that Signed MOUs |
|--|-------------------------------|----------------------------------|
| US Attorney's Office | | |
| USDA Animal and Plant Health Inspection Service | | |
| USDA Rural Development | | |
| US Environmental Protection Agency | | |
| US Fish and Wildlife Service | X | X |
| US Forest Service | X | X |
| Tribes | | |
| Burns Paiute Tribe | | |
| Confederated Tribes of the Warm Springs | | |
| Modoc Tribe of Oklahoma | | |
| Confederated Tribes of the Colville Reservation | | |
| Shoshone-Bannock Tribes of Fort Hall | | |
| Fort McDermitt Paiute Tribe | | |
| Nez Perce Tribe | | |
| Shoshone-Paiute Tribes of Duck Valley | | |
| Confederated Tribes of the Umatilla Indian Reservation | | |
| Fort Bidwell Indian Community | | |
| Klamath Tribes | | |
| Other | | |
| Harney Soil and Water Conservation District | X | X |

Since starting on May 18, 2012, and throughout the planning process, the BLM has conducted numerous meetings with cooperating agencies. Cooperating agencies were also encouraged to attend the scoping open houses and to provide comments during the scoping period and public comment meetings for the draft EIS in January 2014. These agencies have been engaged throughout the planning process, including during development of the alternatives and the Proposed Plan.

Examples of cooperating agency involvement throughout this planning process are as follows:

- Crook, Deschutes, Harney, Lake, and Malheur Counties participated as cooperating agencies throughout the planning process. The counties' areas of expertise are social and economic values and impacts.
- The Harney Soil and Water Conservation District requested cooperating agency status. Their area of expertise is agricultural interests, livestock grazing, and rangeland vegetation.

- The BLM held several informal meetings with Forest Service representatives throughout the planning process. While the Forest Service was not directly involved, the two agencies shared data, where appropriate, to further their respective planning efforts.
- Biologists from the ODFW and USFWS were members of the interdisciplinary team, with special expertise in GRSG biology and management. These team members also were conduits of information to colleagues and leaders of each agency.
- A management oversight team (MOT) met occasionally to provide direction to the interdisciplinary team. The MOT is composed of federal and state decision-makers. Monthly meetings were held early in the process, with meetings becoming less frequent following publication of the DEIS.

In addition, several major meetings were held as listening sessions after the DEIS was released, during development of the Proposed Plan, as follows:

- January 30, 2014, Prineville—IDT, DSD, Mike Haske (BLM Deputy State Director, Resource Planning, Use, and Protection) in attendance; all cooperating agencies were invited
- March 25, 2014, Burns—Harney SWCD and Harney County in attendance
- April 7 through 10, 2014, Bend—IDT, BLM Branch Chief Sally Sovey, and Harney SWCD in attendance; county cooperators were invited

The BLM is aware that there are specific State laws and local plans relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA and its implementing regulations require that BLM's land use plans be consistent with State and local plans only if those plans are consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands. Where State and local plans conflict with the purposes, policies, and programs of Federal law there will be an inconsistency that cannot be resolved. While County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations.

6.5 PUBLIC INVOLVEMENT

Public involvement is a vital and legal component of both the RMPA and EIS processes. Public involvement invests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 CFR, Part 1506.6, thereby ensuring

that federal agencies make a diligent effort to involve the public in the NEPA process. Section 202 of the FLPMA directs the Secretary of the Interior to establish procedures for public involvement during land use planning actions on BLM-administered lands. These procedures can be found in the BLM's Land Use Planning Handbook H-1601-1 (BLM 2005d).

Public involvement for the Oregon Greater Sage-Grouse Sub-Region RMPA/EIS is as follows:

- Public scoping before beginning NEPA analysis to determine the scope of issues and alternatives to be addressed in the RMPA/EIS
- Public outreach via newsletters and press releases throughout the RMPA/EIS process
- Collaboration with federal, state, local, and tribal governments and cooperating agencies throughout the RMPA/EIS process
- Public review and comment on the draft RMPA/EIS
- Public review and protest period on the final RMPA/EIS

6.5.1 Scoping Process

The formal public scoping process for the Oregon Greater Sage-Grouse Sub-Region RMPA/EIS began on December 9, 2011, with the publication of the notice of intent in the *Federal Register* (76, 77008-77011). The notice of intent notified the public of the BLM's intent to prepare EISs and supplemental EISs to incorporate GRSG conservation measures into LUPs; it also initiated the public scoping period. A notice of correction to the notice of intent was released on February 10, 2012 (77 *Federal Register* 7178-7179). The notice of correction extended the scoping period until March 23, 2012.

Project Website

The BLM launched a national GRSG conservation website as part of its efforts to maintain and restore GRSG habitat on public lands. The national website is <http://www.blm.gov/wo/st/en/prog/more/sagegrouse.html>. The BLM has also launched a Great Basin regional website: <http://www.blm.gov/wo/st/en/prog/more/sagegrouse/western.html>. These sites are regularly updated to provide the public with the latest information about the planning process. The Great Basin website provides background information about the project, a public involvement timeline, maps of the planning areas, and copies of public information documents and notice of intent. The dates and locations of scoping open houses were also announced on the Great Basin website.

Press Release

A press release was made available on the national and Great Basin region websites on December 8, 2011, announcing the scoping period for the EIS process. The Oregon BLM State Offices also distributed a press release on January 10, 2012, announcing the scoping period for the EIS process. The press

release provided information on the scoping open houses being held and described the various methods for submitting comments. A second press release was posted on the national and Great Basin websites on February 7, 2012, announcing the extension of the public scoping period to March 23, 2012. A third press release was issued on the national and Great Basin websites on February 9, 2012, announcing the addition of National Forests to the GRSG planning efforts (not applicable to Oregon).

Public Scoping Open House

The BLM hosted five open houses to provide the public with an opportunity to become involved, learn about the project and the planning process, meet the planning team members, and offer comments. The scoping meetings were held in an open house format to encourage participants to discuss concerns and questions with the BLM and other agency staff representatives. The location and date of the open houses were as follows:

- Lakeview, Oregon—January 17, 2012
- Ontario, Oregon—January 23, 2012
- Baker City, Oregon—January 24, 2012
- Burns, Oregon—January 25, 2012
- Prineville, Oregon—January 26, 2012

Scoping Comments Received

Detailed information about the comments received can be found in the National Greater Sage-Grouse Planning Strategy Scoping Summary Report, finalized in May 2012 (BLM and Forest Service 2012). A total of 585 unique written submissions were received for the Great Basin region. Of these, 169 were specific to Oregon. The issues that were identified during public scoping and outreach are described in **Section 1.6.2**, Issues Identified for Consideration in the Oregon Sub-Region Greater Sage-Grouse RMP Amendments, of this RMPA/EIS. These issues guided the development of alternative management strategies outlined in **Chapter 2** of this RMPA/EIS.

6.5.2 Public Comment on the Draft RMPA/EIS

Public participation is ongoing throughout the RMPA/EIS process. One substantial part of this effort was the opportunity for members of the public to comment on the draft RMPA/EIS during the comment period. In the proposed RMPA/Final EIS, the BLM responded to all substantive comments received during the 90-day comment period. The agency will issue a ROD after the release of the proposed RMPA/Final EIS, the Governor's consistency review, and any resolution of protests received on the proposed RMPA/Final EIS.

Public Meetings

A notice of availability (NOA) for the Draft RMPA/EIS was published in the *Federal Register* on November 26, 2013. This initiated a 90-day public comment

period. The BLM notified the public of open house meetings via the project website and a news release to 33 newspapers and radio and television stations.

The BLM held seven public comment open houses in Oregon for the Draft RMPA/EIS from January 6 to January 23, 2014, as follows:

- Prineville, Oregon—January 6, 2014
- Burns, Oregon—January 7, 2014
- Ontario, Oregon—January 8, 2014
- Baker City, Oregon—January 9, 2014
- Lakeview, Oregon—January 13, 2014
- Jordan Valley, Oregon—January 22, 2014
- Durkee, Oregon—January 23, 2014

All meetings were held from 5:30 to 7:30 p.m. The goal was to inform the public about the Draft RMPA/EIS and to obtain further input on the alternatives that were developed and analyzed. In addition, the BLM sought comments on potential impacts resulting from the six alternatives.

At the open houses, displays introduced the various resource topics and presented the six alternatives for the resource topics. Other displays explained the NEPA process and the methods for submitting comments. A slide show looped throughout the open house describing the Oregon Sub-Region Greater Sage-Grouse Draft RMPA/EIS preparation process.

Public comments were solicited at the open houses, and comment sheets were provided.

Comment Analysis Method

After publishing the Draft RMPA/EIS, the BLM held a 90-day public comment period to receive comments on the Draft RMPA/EIS. The BLM received written comments by mail, e-mail, and in person at the public meetings. Comments covered a wide spectrum of thoughts, opinions, ideas, and concerns. The BLM recognizes that commenters invested considerable time and effort to submit comments on the Draft RMPA/EIS. The agency developed a comment analysis method to ensure that all comments were considered as directed by NEPA regulations.

According to NEPA, the BLM is required to identify and formally respond to all substantive public comments. It developed a systematic response process to ensure all substantive comments were tracked and considered. On receipt, each comment letter was assigned an identification number and logged into CommentWorks, an Internet database that allowed the BLM to organize, categorize, and respond to comments.

Substantive comments from each letter writer were coded to appropriate categories, based on the content of the comment; the link to the commenter was retained. These categories generally follow the sections presented in the Draft RMPA/EIS, though some relate to the planning process or editorial concerns.

Similar comments were grouped under a topic heading, and the BLM drafted a statement summarizing the ideas contained in the comments.

A response to a comment indicated whether the commenter's point or points resulted in a change to the Draft RMPA/DEIS. A summary of major changes between the Draft RMPA/EIS and the Proposed RMPA/FEIS can be found at the beginning of each chapter.

Although each comment letter was diligently considered, the comment analysis process involved determining whether a comment was substantive or not. In performing this analysis, the BLM relied on the CEQ's regulations to determine what constituted a substantive comment.

A substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy and adequacy of the information and analysis in the EIS
- Presents reasonable alternatives other than those in the draft EIS that meet the purpose and need of the proposed action and address significant issues
- Questions, with a reasonable basis, the merits of an alternative or alternatives
- Causes changes in or revisions to the proposed action
- Questions, with a reasonable basis, the adequacy of the planning process itself

Additionally, the BLM's NEPA handbook identifies the following types of substantive comments:

- 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 are substantive but may or may not lead to changes in the Final EIS. Interpretations of the 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 authorized officer responsible

for preparing the EIS does not think that a change is warranted, the officer should provide the rationale for that conclusion.

- Comments that identify new impacts, alternatives, or mitigation measures—Public comments on a Draft EIS that identify impacts, alternatives, or mitigation measures that were not addressed in the draft are substantive. This type of comment requires the authorized officer to determine whether it warrants further consideration. If so, the authorized officer must determine whether the new impacts, alternatives, or mitigation measures should be analyzed in the Final EIS, a supplement to the Draft EIS, or a completely revised and recirculated Draft EIS.
- Disagreements with significance determinations—Comments that directly or indirectly question, with a reasonable basis, determinations regarding the significance or severity of impacts are substantive. A reevaluation of these determinations may be warranted and may lead to changes in the Final EIS. If, after reevaluation, the authorized officer does not think that a change is warranted, the response should provide the rationale for that conclusion.

Some submissions contained substantive comments but were outside the scope of this project. These included comments on subjects not related to the project, other GRSG projects, or BLM laws, rules, regulations, or policy. The BLM reviewed these comments and sent them along to the appropriate party as needed; however, they are not included in the comment response for this project.

Comments that failed to meet the above description were considered non-substantive. Many comments received throughout the process were categorized as follows:

- Expressed personal opinions or preferences
- Had little relevance to the adequacy or accuracy of the Draft RMPA/EIS
- Represented commentary regarding resource management without any real connection to the document being reviewed

These commenters did not provide specific information to assist the planning team in making a change to the Preferred Alternative, did not suggest other alternatives, and did not take issue with methods used in the Draft RMPA/EIS; as such, they are not addressed further in this document.

Examples of these comments are the following:

- “The best of the alternatives is Alternative D [or A, B, or C].”

- “The BLM has yet to show land stewardship at or above the level currently demonstrated by the private sector.”
- “Your plan does not reflect balanced land management.”
- “Stop giving away land to the mineral companies.”
- “More land should be protected as wilderness.”
- “I want the EIS to reflect the following for this area: no grazing, no logging, no drilling, no mining, and no OHVs.”
- “You need to protect all ACECs/Wild and Scenic Rivers/areas with wilderness characteristics.”
- “Do not add any more road closures to what is now in existence.”
- “People need access and the roads provide revenue for local communities.”
- “More areas should be made available for multiple uses (drilling, OHVs, ROWs, etc.) without severe restrictions.”

Opinions, feelings, and preferences for one element or one alternative over another and comments of a personal or philosophical nature were all read, analyzed, and considered; however, because such comments were not substantive, the BLM did not respond to them.

It is also important to note that, while all comments were reviewed and considered, comments were not counted as “votes.” The NEPA public comment period is neither an election nor does it result in a representative sampling of the population. Therefore, public comments are not appropriate to be used as a democratic decision-making tool or as a scientific sampling mechanism.

Comments providing editorial corrections to the document were reviewed and incorporated. The Final RMPA/EIS has been extensively technically edited and revised to fix typographical errors, missing references, definitions, and acronyms, and other clarifications as needed.

Public Comments

A total of 642 unique comment letters, forms, and e-mails were received during the 90-day public comment period. These documents resulted in 1,776 substantive comments (see **Table 6-2**, Number of Unique Submissions and Comments by Affiliation).

**Table 6-2
Number of Unique Submissions and Comments by Affiliation**

| Group | Number of Submissions | Number of Comments |
|---|------------------------------|---------------------------|
| Private individuals | 516 | 596 |
| Organizations (including businesses and environmental and wildlife protection groups) | 35 | 390 |
| Associations (for example, user groups, recreational clubs, realty associations, industry groups, and partnerships) | 46 | 335 |
| Federal agencies (EPA, USFWS, USFS, NPS) | 2 | 61 |
| State government (state agencies, Governor's office) | 3 | 155 |
| Local government (county commissions and departments) | 32 | 236 |
| Tribal government | 0 | 0 |
| Anonymous | 86 | 3 |
| Total | 642 | 1,776 |

In addition to the unique submissions discussed above, 19,504 form letters were submitted during the public comment period. Form letters are exact or very close copies of a letter and are submitted multiple times by different individuals. They may add additional language to the letter, but this usually does not substantially change the content of the letter. Often, form letters are created by an organization and sent to their members, who in turn submit this letter to the planning effort.

For the Oregon Draft RMPA/EIS, 11 different form letter masters were submitted, as follows:

- 2,916 from WildEarth Guardians
- 156 from the Oregon Natural Desert Association
- 2,676 from the American Bird Conservancy
- 2,988 from Defenders of Wildlife
- 8,733 from the American Wild Horse Preservation Campaign
- 1,932 from the Center for Biological Diversity
- 16 from the Harney Electric Cooperative
- 57 from Farm Beef Cattleman
- 7 from the Union County Cattlemen
- 18 from an unknown ranching organization
- 5 from an unknown organization or association

One copy of each of these letters was included in the comment analysis process as a master form letter. All of the form letters were reviewed for additional substantive content, which was included in the comment analysis process.

Table 6-3, Number of Comments on the Draft RMPA/EIS by Category, displays the number and percentage of substantive comments received by resource topic. Comments suggesting editorial changes or requesting a comment period extension or those that were considered outside the scope of this project were reviewed and considered; however, they were not included in the formal comment responses.

Table 6-3
Number of Comments on the Draft RMPA/EIS by Category

| Topic | Number of Comments | Percent of Total Comments |
|---------------------------------------|---------------------------|----------------------------------|
| GRSG | 218 | 12.3 |
| NEPA | 171 | 9.6 |
| Livestock grazing | 113 | 6.4 |
| Socioeconomics | 156 | 8.8 |
| Vegetation—sagebrush | 83 | 4.7 |
| Other laws | 8 | 0.5 |
| FLPMA | 21 | 1.2 |
| Locatable minerals | 25 | 1.4 |
| Predation | 57 | 3.2 |
| Leasable minerals | 11 | 0.6 |
| Lands and realty | 55 | 3.1 |
| Fire and fuels | 74 | 4.2 |
| Wild horses and burros | 16 | 0.9 |
| Travel management | 66 | 3.7 |
| Vegetation—riparian | 14 | 0.8 |
| Water resources | 13 | 0.7 |
| Recreation | 7 | 0.4 |
| Climate change | 7 | 0.4 |
| Noise | 3 | 0.2 |
| Tribal interests | 2 | 0.1 |
| Fish and wildlife | 4 | 0.2 |
| Lands with wilderness characteristics | 6 | 0.3 |
| Soil resources | 5 | 0.3 |
| ACECs | 23 | 1.3 |
| Salable minerals | 3 | 0.2 |
| Cultural resources | 2 | 0.1 |
| Noxious and invasive weeds | 24 | 1.4 |
| Edits* | 89 | 5.0 |
| Out of scope* | 484 | 27.3 |
| Extension requests* | 16 | 0.9 |
| Total | 1,776 | 100.0 |

*Comments in these categories were reviewed for their content but were not included in the comment responses.

The comments received on the Draft RMPA/EIS were similar to the issues raised during public scoping. In many cases, commenters expressed a desire for very specific implementation level (project level) details to be included in the RMPA. As described in Chapters 1 and 2, the RMPA/EIS provides general guidance and identifies allowable uses and allocations, but it is not meant to address all details about individual projects. A separate environmental review will be conducted for specific projects at the implementation level to address these details. Some comments spanned several topical areas and included a discussion about a resource use or activity. They listed concerns about the resources that would be impacted by the use, or conversely, the impact that restrictions would have on resource uses or activities.

All comment summaries and responses organized by resource, resource use, or EIS planning regulation can be found in **Appendix V**, Public Comment Report; an overview of these summaries and responses can be found below in **Table 6-4**, Overview of Comments by Category. Comments related to editorial changes, out of scope topics, and extension requests and non-substantive comments were not included in the comment responses.

Table 6-4
Overview of Comments by Category

| Topic | Overview |
|--------------------|--|
| ACECs | Commenters asserted that a number of proposed RNAs do not meet the criteria and should therefore not be considered; they suggested that certain areas did not have relevance and importance criteria and wanted to see a greater range of alternatives for ACEC locations. |
| Climate change | Commenters questioned the suitability of GRSG habitat in Mormon Basin and the inconsistencies and lack of information in Chapter 3; they wanted to see more analysis of impacts from grazing and implications for vegetation. |
| Cultural resources | Commenters requested analysis of grazing on cultural and historic resources. |
| Fire and fuels | Commenters requested clarification on the potential impacts of the plan on fire conditions; they suggested potential changes to alternatives or management actions. |
| FLPMA | Commenters claimed that the Draft RMPA/EIS failed to comply with the multiple use mandate required under FLPMA. They also suggested that the plan did not take into account consistency with state, local, and tribal plans and policies. |
| GRSG | Commenters claimed the NTT report was inadequate to use as a primary source in the plan; found the plan to be inconsistent with COT conservation objectives; requested separate NEPA analysis for WO IM 2012-043 and 2012-044; requested clarification on the range of alternatives and habitat mapping; suggested new or additional literature to be used for best available information on GRSG; made recommendations on how to improve the impact analysis of various resources on GRSG; found the cumulative impacts to be deficient; and requested clarification or revisions to mitigation measures. |

**Table 6-4
Overview of Comments by Category**

| Topic | Overview |
|---------------------------------------|--|
| Lands and realty | Commenters requested additions to the range of alternatives, including information and a full range of management options; suggested the analysis did not fully address impacts on private lands; and said the Draft RMPA/EIS failed to include a comprehensive list of required mitigation measures for ROW development. |
| Lands with wilderness characteristics | Commenters claimed the BLM did not adhere to current guidance, wanted additional actions to protect wilderness characteristics, and suggested that the analysis of impacts on wilderness characteristics did not account for beneficial and adverse impacts and that it did not analyze areas identified by the public as exhibiting wilderness characteristics. |
| Leasable minerals | Commenters suggested new management actions, including different buffer distances, additional seasonal restrictions, and other protective measures. They also requested that additional studies and information be considered. |
| Livestock grazing | Commenters argued that the BLM has no authority to retire or terminate grazing permits; recommended expanding the range of alternatives for livestock grazing; requested clarification on certain grazing terms and management actions; provided additional citations for baseline information and impact analysis; found the analysis of impacts to be inadequate; and requested additional items be added to the cumulative impacts section. |
| Locatable minerals | Commenters questioned the BLM's authority to manage mining on split-estate; requested habitat mitigation requirements and consistent limitations on surface disturbance; identified inaccuracies regarding the locatable minerals being mined in the planning area; and requested that the Mormon Basin mining project be added to the affected environment and cumulative impact analysis. |
| NEPA | Commenters asserted that the Proposed Plan does not comply with the requirements of NEPA; does not adequately notify the public about the DEIS; does not coordinate with local agencies; does not provide a wide enough range of alternatives; does not use the best available data; relies on faulty GIS data; and does not provide an adequate cumulative impacts analysis or mitigation measures. |
| Noise | Commenters suggested that the BLM should correct inconsistencies in sections evaluating the effects of noise on leks and should include new scientific research in the Final EIS. |
| Other laws | Commenters argued that the BLM failed to document how the EIS and actions considered in the EIS comply with other laws. |
| Predation | Commenters said the Draft RMPA/EIS failed to adequately address impacts on GRSG from predation. |
| Recreation | Commenters recommended using seasonal closures and noise regulations, wanted more analysis on the impacts of hunting on GRSG populations, and requested different visitation and expenditure data be used in the Final EIS. |
| Salable minerals | Commenters said the Draft RMPA/EIS was unclear on how rock quarries on private land would be affected and how closures on public and private land would impact the availability of the material and the cost of maintaining roads. |

**Table 6-4
Overview of Comments by Category**

| Topic | Overview |
|------------------------|---|
| Socioeconomics | Commenters wanted the baseline data revised to include more current and relevant data, claimed the analysis used was at the wrong scale to make the information meaningful, and noted that the direct, indirect, and cumulative impact analysis was inadequate in many ways. |
| Soil resources | Commenters recommended adding information on biological soil crusts and recommended new references for the impacts of livestock grazing on soil resources. |
| Special status species | Commenters requested clarification of the disturbance cap and conifer removal actions and requested additional analysis of impacts from removing water developments and increasing wild horse and burro use in riparian habitats. |
| Travel management | Commenters expressed concern about impacts on new route construction, administrative use, and emergency response; advocated for more or fewer travel restrictions; asserted that the baseline information was inaccurate; questioned the accuracy and adequacy of the impact analysis; and recommended clarification about mitigation measures. |
| Tribal interests | Commenters requested improved government-to-government consultation with the tribes in the planning area and better analysis of the impacts of climate change, fire, and drought on tribes. |
| Vegetation—riparian | Commenters requested including tamarisk issues and claimed the cumulative impact analysis needed to better document the beneficial impacts of riparian vegetation communities. |
| Vegetation—sagebrush | Commenters voiced concern about prioritizing vegetation treatments; requested additional information about actions within the alternatives; said the Draft RMPA/EIS fails to provide adequate baseline information related to invasive species spread and juniper establishment; requested more detailed analysis; and requested additional information on the VDDT model. |
| Vegetation—weeds | Commenters requested greater analysis of the GRSG wildfire and invasive species habitat assessments, discussion of cooperative weed management agreements, and clarification of methods used to control weeds. Commenters also provided additional literature for review. |
| Water resources | Commenters noted concerns pertaining to the probability of impacts; requested better information on water quality, water quantity, and water rights; recommended literature to review; and questioned the accuracy of the analysis of impacts on water resources from livestock grazing and vehicle travel. |
| Wild horses and burros | Commenters suggested the BLM did not consider alternatives that adequately limited or managed wild horses in the planning area; requested greater justification for increasing or decreasing AUMs; requested additional information on the role of HAF in managing wild horses and burros; suggested additional citations be added; requested information on current population levels and whether they exceed AML; and requested additional analysis of the cumulative impacts of removing water developments. |
| Wilderness and WSAs | Commenters requested additional actions within Wilderness and WSAs to benefit GRSG, such as native seed planting, removal of structures, and changes to recreation management. |

Complete responses, including rationales and any associated changes made in the Proposed RMPA/FEIS, can be found in **Appendix V**, Public Comment Report. A brief overview of changes to the document between the DEIS and FEIS is as follows:

- The disturbance cap in the Proposed LRMA/FEIS was revised to provide additional detail, such as enhanced descriptions of what types of activities would count toward the disturbance totals, where disturbance activities would count against the cap, reclamation and habitat requirements for a disturbed area for both temporary and permanent disturbance, and how the cap would be implemented and monitored. **Appendix I**, Disturbance Cap Calculation Method, has also been added to the Proposed RMPA/FEIS and contains a disturbance inventory method to more accurately assess current disturbance levels and potential impacts across the planning area.
- A more comprehensive list of cumulative projects, past and future, has been developed and was used to support a more detailed analysis of cumulative impacts. Cumulative impacts have also been reviewed for consistency with the rest of the plan.
- Additional language has been added describing the adaptive management approach for the RMPA/EIS level.
- Mitigation and monitoring have been further defined as a regional mitigation framework and national monitoring framework, detailed in **Appendices E** and **G**, respectively.
- Management objectives and actions in Chapter 2 have been updated.
- Additional literature was reviewed and added to the baseline information in Chapter 3.
- Chapter 4 has been updated with new information and analysis and was revised for consistency with Chapter 3.
- Clarifications have been added on specific topics that commenters found confusing or poorly described, including implementation-level decisions.
- All comments citing editorial changes to the document were reviewed and incorporated, as appropriate. The Proposed RMPA/FEIS has been edited and revised to fix typographical errors, missing references, definitions, acronyms, calculations, and other inconsistencies.

6.5.3 Future Public Involvement

Public participation will be ongoing throughout the remainder of the RMPA/EIS process.

An NOA will be published in the *Federal Register* to notify the public of the availability of the Proposed RMPA/Final EIS. The NOA will also outline protest procedures during the 30-calendar-day protest period.

The Proposed RMPA/Final EIS will be available for downloading from the project website at <http://www.blm.gov/or/energy/opportunity/sagebrush.php>. It also will be available for review at the BLM Oregon State Office and district offices in Baker, Burns, Lakeview, Prineville, and Vale. Press releases will be issued to notify the public of the Proposed RMPA/Final EIS availability. All recipients of the Draft RMPA/EIS and all parties who submitted written comments on the Draft RMPA/EIS will receive the Proposed RMPA/FEIS in either a hard copy or CD, or they will be able to download it from the website. The BLM will notify those who previously received the Draft RMPA/EIS electronically. The BLM Oregon State Office maintains the distribution list for the Proposed RMPA/FEIS, which is available on request.

The BLM will issue a ROD after the release of the Proposed RMPA/FEIS, the Governor's Consistency Review, and any resolution of protests received on the Proposed RMPA/FEIS.

6.6 LIST OF PREPARERS

This RMPA/EIS was prepared by an interdisciplinary team of staff from the BLM and Environmental Management and Planning Solutions, Inc. (EMPSi; see **Table 6-5**, List of Preparers). In addition, staff from numerous federal, state, and local agencies and nonprofit organizations contributed to developing the RMPA/EIS.

The following is a list of people who prepared or contributed to the development of the RMPA/EIS.

Table 6-5
List of Preparers

| Name | Role/Responsibility |
|--------------------------------|---|
| BLM Oregon State Office | |
| Joan Suther | Project Manager |
| Stewart Allen | Social and Economic Conditions |
| Claudia Campbell | GIS Specialist |
| Janet Cheek | Lands and Realty Specialist |
| Jeanne DeBenedetti Keyes | Lead GIS Specialist |
| Paul Fyfield | Lead Cartographer |
| Tim Barnes | Core IDT Lead—Renewable Energy, Mineral Resources |
| Al Doelker | Core IDT Lead—Riparian and Wetlands, Fisheries and Aquatic Wildlife |
| Louisa Evers | Core IDT Lead—Vegetation |
| Charlie Fifield | Core IDT Lead—Rangelands |
| Glenn Frederick | Core IDT Lead—Special Status Species, Big Game Species |
| Craig Goodell | Core IDT Lead—Wildland Fire Management |

**Table 6-5
List of Preparers**

| Name | Role/Responsibility |
|---|--|
| Cathy Hopper | Records Manager |
| Robert Hopper | Core IDT Lead—Forest and Woodland, Wild Horses and Burros, Livestock Grazing |
| Janet Hutchison | Core IDT Lead—Lands and Realty and Renewable Energy |
| Chris Knauf | Core IDT Lead—Recreation and Travel Management |
| Maggie Langlas Ward | Core IDT Lead—Special Designations, including Lands with Wilderness Characteristics; NEPA review |
| Stan McDonald | Core IDT Lead—Cultural Resources and Tribal Interests |
| Mark Mousseaux | Core IDT Lead—Special Status Plants, ACECs, and RNAs |
| Jessica Rubado | Environmental Planner |
| Josh Sidon | Core IDT Lead—Social and Economic Conditions (Including Environmental Justice) |
| Dale Stewart | Core IDT Lead—Soil Resources, Water Resources |
| Steve Storo | Core IDT Lead—Mineral Resources |
| Fish and Wildlife | |
| Jeffrey A. Dillon | Endangered Species Division Manager, US Fish and Wildlife Service |
| Dave Budeau | Upland Game Bird Coordinator, Oregon Department of Fish and Wildlife |
| EMPSi: Environmental Management and Planning Solutions, Inc. | |
| David Batts | Program Manager |
| Derek Holmgren | Project Manager and Project Support—Soils and Water Resources |
| Amy Cordle | Project Support—Climate Change |
| Angie Adams | Project Support—Special Designations and Lands with Wilderness Characteristics |
| Annie Daly | Project Support—Special Designations and Lands with Wilderness Characteristics |
| Carol-Anne Garrison | Project Support—Cultural Resources and Tribal Interests; Public Comment/Response |
| Zoe Ghali | Project Support—Livestock Grazing and Wild Horses and Burros |
| Peter Gower | Project Support—Lands and Realty |
| Morgan Trieger | Project Support—Fish and Wildlife; Cumulative Effects Analysis |
| Brandon Jensen | Project Support—Fish and Wildlife |
| Katie Patterson | Project Support—Mineral Resources |
| Holly Prohaska | Project Support—Livestock Grazing and Wild Horses and Burros |
| Jennifer Thies | Project Support—Wildland Fire Management |
| Drew Vankat | Project Support—Recreation and Travel Management; Cumulative Effects Analysis |
| Jennifer Whittaker | Project Support—Minerals |
| Liza Wozniak | Project Support—GRSG |
| Meredith Zaccherio | Project Support—Vegetation |
| Marcia Rickey | GIS Specialist |
| Jenna Jonker | GIS Specialist |

Table 6-5
List of Preparers

| Name | Role/Responsibility |
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| Kate Krebs | Project Support—Special Designations |
| Randolph Varney | Technical Editor |
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| Cindy Schad | Word Processor |
| ICF International Team | |
| Rob Fetter | Project Manager—Socioeconomics |
| Alex Uriarte | Project Assistance |
| Roy Allen | Project Assistance |

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