

**United States Department of the Interior  
Bureau of Land Management  
Glenwood Springs Field Office**

**Comment Analysis Report**

for the

**Record of Decision**

for the

**Resource Management Plan  
Amendment for Portions of the Roan  
Plateau Planning Area**

and

**Supplemental Information for  
Proposed Areas of Critical  
Environmental Concern with  
Associated Resource Use Limitations  
for Public Lands in Garfield and Rio  
Blanco Counties, CO**



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## **1 INTRODUCTION**

The Resource Management Plan Amendment (RMPA) for the Roan Plateau Planning Area was prepared in consultation and coordination with interested public individuals and organizations, federal and State of Colorado agencies, and local municipal and county governments. Involvement and input from all of these entities is a vital component of the RMPA process and Environmental Impact Statement (EIS) preparation. Public involvement for the RMPA was conducted in three phases: public scoping, public review and comment, and Cooperating Agency (local government input) on the Draft RMPA/Draft EIS and on the Proposed RMPA/Final EIS. All public comments and BLM responses were detailed in Chapter 6 – Consultation and Coordination in the Final Resource Management Plan Amendment and Environmental Impact Statement, August 2006.

A final 60-day public comment period was initiated on June 11, 2007 with the publication of the Notice of Availability of the Record of Decision for the Resource Management Plan Amendment (RMPA) for Portions of the Roan Plateau Planning Area and Supplemental Information for Proposed Areas of Critical Environmental Concern (ACEC) with Associated Resource Use Limitations for Public Lands in Garfield and Rio Blanco Counties, CO (Federal Register Vol. 72, No.111). This NOA contained supplemental information regarding four proposed ACECs identified in the Proposed Resource Management Plan Amendment/Final Environmental Impact Statement (PRMP/FEIS). Written comments on the proposed ACECs were accepted at the Bureau of Land Management, Glenwood Springs Field Office, 50629 Highways 3 and 24, Glenwood Springs, Colorado 81601.

This comment period was reopened and extended for an additional 14 days to allow for submission of comments in an electronic format via the Internet to the Colorado BLM website: <http://www.blm.gov/rmp/co/roanplateau/comments.htm> through a Notice to Reopen the Public Comment Period Regarding Supplemental Information for Proposed Areas of Critical Environmental Concern (ACEC) with Associated Resource Use Limitations Identified in the Proposed Roan Plateau Resource Management Plan Amendment/Final Environmental Impact Statement (PRMPA/FEIS) for Public Lands in Garfield and Rio Blanco Counties, CO (Federal Register Vol.72, No. 159).

## **2 COMMENTS RECEIVED**

A total of 41,626 comment submissions (41,795 comments) were received by BLM at the close of the public comment period on midnight, August 31, 2008. The large majority of these submissions (41,544; more than 99 percent) were received via a cd delivered to the BLM by the Natural Resources Defense Council (NRDC).

The largest category of comment submissions comprised one of two form letters. These identical submissions were received via the project website comment function, hard copy letters, and the NRDC-delivered cd. Each form letter contained multiple comments, but for the purpose of this analysis, each form letter submission was counted as a single comment. The comments in each form letter are summarized in Table 1.

**Table 1. Summary of Form Letter Comments**

Form Letter	Summary of Comments
Form Letter 1	<ul style="list-style-type: none"> <li>▪ BLM must give priority to protecting ACECs.</li> <li>▪ BLM’s proposed ACECs must be expanded and strengthened to protect the entire watersheds vital to native trout, to protect wildlife habitat, and to preserve backcountry recreation and wilderness values.</li> <li>▪ All lands at the base of Roan Plateau with wildlife values should be included in an ACEC with mandatory and specific protections for winter range, migration corridors, and other important wildlife habitat.</li> <li>▪ ACECs should be closed to oil and gas leasing or protected with non-modifiable No Ground Disturbance rules.</li> </ul>
Form Letter 2	<ul style="list-style-type: none"> <li>▪ BLM must give priority to protecting ACECs and should designate as ACECs all qualifying lands.</li> <li>▪ The Roan Plateau ACECs should be expanded to include all lands with ACEC and wilderness study area criteria as well as lands at the base of the plateau with important wildlife habitat.</li> <li>▪ ACECs should be closed to oil and gas leasing.</li> <li>▪ BLM should provide a meaningful analysis of all Roan Plateau lands that qualify as ACECs, and provide for effective public comment and consideration.</li> <li>▪ The BLM should suspend its decision on the Roan Plateau’s ACECs, allow the Governor of Colorado a new opportunity to review the Roan Plateau plan in its entirety, and include in its analysis a full consideration of all the area’s qualifying ACEC lands.</li> <li>▪ The BLM should allow these documents to be submitted electronically by individuals to the BLM.</li> </ul>

A total of 335 unique (non-form letter) comment submissions were received. These included 504 distinct comments. All comments are summarized by topic in Table 2.

**Table 2. Summary of Specific Comments by Topic**

Topic	Unique	Form	Total
ACECS	320	41,291	41,613
Natural Resource Protection/Wildlife	16		16
NEPA Application	2		2
Oil and Gas Development	87		87
Regulations/Public Involvement	7		7
Other	72		74
<b>Total</b>	<b>504</b>	<b>41,291</b>	<b>41,795</b>

**Table 3. Acronyms Referenced in Comments and Responses**

<b>Acronym</b>	<b>Definition</b>
<b>ACEC</b>	Area of Critical Environmental Concern
<b>BA</b>	Biological Assessment
<b>BLM</b>	Bureau of Land Management
<b>BMP</b>	Best Management Practice
<b>BO</b>	Biological Opinion
<b>COA</b>	Condition of Approval
<b>CDNR</b>	Colorado Department of Natural Resources
<b>CDOW</b>	Colorado Division of Wildlife
<b>CEQ</b>	Council on Environmental Quality
<b>CFR</b>	Code of Federal Regulations
<b>COGCC</b>	Colorado Oil and Gas Conservation Commission
<b>CRCT</b>	Colorado River Cutthroat Trout
<b>CSU</b>	Controlled Surface Use
<b>DEIS</b>	Draft Environmental Impact Statement
<b>DRMP</b>	Draft Resource Management Plan
<b>EIS</b>	Environmental Impact Statement
<b>ESA</b>	Endangered Species Act
<b>FLPMA</b>	Federal Land Policy and Management Act
<b>GIS</b>	Geographic Information System
<b>I-70</b>	Interstate 70
<b>MOU</b>	Memorandum of Understanding
<b>NEPA</b>	National Environmental Policy Act
<b>NGD</b>	No [Long-term] Ground Disturbance
<b>NOA</b>	Notice of Availability
<b>NOI</b>	Notice of Intent
<b>NOSR</b>	Naval Oil Shale Reserve
<b>NSO</b>	No Surface Occupancy
<b>RFD</b>	Reasonable Foreseeable Development
<b>RMP</b>	Resource Management Plan
<b>RMPA</b>	RMP Amendment
<b>ROD</b>	Record of Decision
<b>ROW</b>	Right-of-Way
<b>SSR</b>	Site-Specific Relocation
<b>TL</b>	Timing Limitation
<b>USDI</b>	U.S. Department of the Interior
<b>WSA</b>	Wilderness Study Area
<b>WSR</b>	Wild and Scenic River