



CHAPTER 1

**PURPOSE
AND NEED**



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1.1 OVERVIEW OF THE RMPA/EIS

This Proposed Resource Management Plan (RMP) Amendment (RMPA) and Final Environmental Impact Statement (EIS) evaluates the environmental consequences of amending existing RMPs for the Glenwood Springs Resource Area (GSRA) and White River Resource Area (WRRRA) as they pertain to the Roan Plateau Planning Area (Planning Area) of west-central Colorado. Figures 1-1, 1-2, and 1-3 show the location, land ownership status, and topography of the Planning Area, respectively.

The U.S. Department of the Interior (USDI) Bureau of Land Management (BLM) is amending existing RMPs for the Planning Area in accordance with the Federal Land Policy and Management Act (FLPMA), which specifies periodic updates to guide management of public lands within BLM's jurisdiction. In this case, an amendment is needed to incorporate lands for which management was transferred to BLM from the U.S. Department of Energy (DOE). BLM-administered lands within the Planning Area include 73,602 acres with a Federal surface and mineral estate or with a Federal mineral estate and private surface estate.

Management of the Planning Area is currently guided by the following documents:

- Glenwood Springs Resource Area Oil and Gas Leasing and Development Final Supplemental Environmental Impact Statement (FSEIS), January 1999 (BLM 1999a), hereafter referred to as the 1999 FSEIS
- Glenwood Springs Resource Area Oil and Gas Leasing & Development Record of Decision (ROD) and RMP Amendment, March 1999 (BLM 1999b), hereafter referred to as the 1999 ROD and RMPA
- Glenwood Springs Resource Area RMP, January 1984 (Revised 1988)(BLM 1988a), hereafter referred to as the 1984 GSRA RMP. The 1984 date is retained because the 1988 revision consisted only of updating certain data.
- White River Resource Area RMP (BLM 1996a)(ROD issued July 1997), hereafter referred to as the 1997 WRRRA RMP.
- Operational Management Plan for Naval Oil Shale Reserves 1 and 3 (DOE 1988)
- Colorado Public Land Health Standards and Guidelines for Livestock Grazing Management Decision Record and Finding of No Significant Impact (BLM 1997a)

The Planning Area boundary shown on Figures 1-1 through 1-3 and Maps 1 through 29 in Appendix A encompasses a total 127,007 acres. This total includes 66,934 acres with Federal surface and minerals, multiple parcels totaling 6,668 acres with private surface and Federal minerals, and a total of 53,405 acres of lands with both private surface and private minerals. Since lands with both private surface and private minerals are not subject to BLM planning or management, approximately 42 percent of the total Planning Area shown on the figures and maps is not subject to BLM planning or management decisions. However, these lands were included in the total Planning Area boundary because of the close spatial relationship with Federal lands and the many ways in which uses and conditions in either private or Federal lands affect, both directly and indirectly, uses and conditions in the other.

The 73,602 acres of Federal lands in the Planning Area include 55,354 acres in Naval Oil Shale Reserves (NOSRs) Numbers 1 and 3 (Figure 1-2). Management responsibility for the NOSRs was formally transferred to BLM from DOE in 1997. The NOSRs have not previously been the subject of a

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coordinated planning process and are currently managed under the guidance of DOE's Operational Management Plan (OMP), the 1984 GSRA RMP, and the 1997 WRRRA RMP.

Non-NOSR BLM lands are located primarily below the Roan Cliffs (Figure 1-2). Lands with a "split estate" (private surface but Federal minerals) are located both atop the plateau and below the cliffs and include some disjunct parcels in the southwestern and west-central portions of the Planning Area. As shown by Figure 1-2, the split-estate lands differ as to which mineral resources are Federally owned. Federal ownership may be limited to fluid minerals (oil and gas), limited to one or more other minerals (e.g., oil shale, coal), or inclusive of all economic minerals. Management by BLM of split-estate lands is limited to activities related to the mineral estate (e.g., oil and gas development). BLM authority arising from the nexus created by Federal minerals includes management of activities that occur on the privately owned surface and associated with the mineral estate. Examples include the location, design, operation, and reclamation of well pads, roads, pipelines, and other surface facilities.

In recent years, the Planning Area and nearby areas have been subject to rapid growth of the human population and oil and gas development. These factors cause competing pressures on land use management and thus warrant a consistent, coordinated planning approach. Updating the existing RMPs will also permit BLM to incorporate the required Colorado Public Land Health Standards and Guidelines for Livestock Grazing (Land Health Standards) and Travel Management Designations into their land management program for the Planning Area. Another reason to amend the existing RMPs is that FLPMA requires BLM to inventory public lands, giving priority to the designation and protection of Areas of Critical Environmental Concern (ACECs). Such inventories have been completed as part of the current planning process but did not previously exist for the transferred lands.

FLPMA provides the authority for BLM to formulate land use plans and requires that an RMP be enacted to guide management decisions. FLPMA states that BLM land management shall be guided by the principles of multiple use and sustained yield. In addition, FLPMA Section 302(a) requires that where a tract of land has been dedicated to a specific use according to law, such as Public Law 105-85 that transferred NOSRs 1 and 3 to BLM, the tract shall be managed in accordance with the provisions of FLPMA. The primary purpose of this RMPA/EIS is to ensure that BLM manages the Planning Area in accordance with FLPMA as well as all other applicable laws and regulations.

The National Environmental Policy Act (NEPA) requires the preparation of the EIS component of this document, because implementation of a selected RMP Amendment would constitute a major Federal action significantly affecting the environment. The "proposed action" under NEPA is the implementation of the selected RMP Amendment, referred to throughout this document as the "Proposed Plan."

The remaining portions of Chapter 1 describe the purpose of the action (Section 1.2), the need for the action (Section 1.3), the Planning Area (Section 1.4), agency roles and responsibilities (Section 1.5), BLM's land use planning process (Section 1.6), the NEPA process and related topics (Section 1.7), and the scoping process that helped shape the process and this document from its inception.

Chapter 2, Alternatives, describes the five alternatives evaluated in detail in the Draft RMPA/EIS, as well as the Proposed Plan resulting from BLM's consideration of input by the public and Cooperating Agencies through the Consultation and Coordination process. Chapter 2 also discusses the alternatives selection process and the alternatives that were considered but eliminated from detailed analysis.

Chapter 3, Affected Environment, describes the current physical, biological, human, and land use environments of the Planning Area. The description provides a baseline against which to compare the impacts of the alternatives. The baseline described in this Chapter represents environmental and social conditions in the Planning Area at the time this document was being prepared.

Chapter 4, Environmental Consequences, evaluates how and to what extent baseline conditions would be altered by the Proposed Plan and, with reference to the Draft RMPA/EIS, by the five alternatives

previously analyzed. These changes include direct and indirect; onsite and offsite; short-term, temporary, and long-term; and adverse and beneficial impacts, both individually and cumulative to other impacts.

Chapter 5, References, lists the sources of information used in preparing this RMPA/EIS. Not all references reviewed by BLM and included in Chapter 5 are cited in the body of the document.

Chapter 6, Consultation and Coordination, describes the process for receiving and, as deemed appropriate by BLM, incorporating comments and other information provided by the public and Cooperating Agencies following publication of the Draft RMPA/EIS.

Appendices A through M provide supporting information for the chapters described above. These include the original appendices (A through H) provided with the Draft RMPA/EIS, as well as new appendices I through M. Note that to avoid confusion, the new appendices are added to the end of the previous group rather than incorporated into the position they would occupy based on subject content. Thus, references to appendices in the body of the document are not necessarily in alphabetical order. Additionally, Appendix G was removed from the Proposed Plan/Final EIS, however, the title page is included to maintain the order of the appendices.

1.2 PURPOSE OF THE ACTION

The purpose of amending the existing RMPs for the Planning Area is to provide an integrated plan that guides future site-specific analysis and decisions in accordance with the following goals and objectives:

- Implement BLM's mission to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.
- Facilitate management of the natural resources of the Planning Area for multiple-use and long-term value, recognizing that the mix of permitted and allowable uses will vary from area to area and over time.
- Comply with the provisions of Public Law 105-85 transferring the approximately 55,354 acres within NOSRs 1 and 3 from DOE to USDI.
- Ensure a consistent, coordinated approach to managing lands within the Planning Area.

To achieve these goals, BLM must:

- Identify desired outcomes and allowable uses and actions that restore and maintain the health of the land; preserve natural and cultural heritage; reduce threats to public health, safety, and property; and provide for environmentally responsible recreational and commercial activities.
- Evaluate the need for designation of ACECs for areas that contain resource values that meet BLM's criteria for relevant and important values.
- Evaluate the need for designation of Special Recreation Management Area (SRMAs) or other management determinations, as applicable, such as for stream segments eligible for designation as Wild and Scenic Rivers (WSRs), Watershed Management Areas (WMAs), areas having wilderness character, and Back Country Byways.
- Establish travel designations that replace interim travel designations on transferred lands and affirm or change travel designations on lands in the rest of the Planning Area.
- Establish conservation measures for all species listed as threatened, endangered, proposed, candidate, or BLM sensitive. Conservation measures are designed to prevent the need for listing of additional species under the Endangered Species Act (ESA) and to improve the condition of all special status species and their habitats to a point where their special status recognition is no longer warranted. (See August 30, 2000, Interagency Memorandum of Agreement (MOA) for Programmatic

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Endangered Species Act Section 7 Consultation and BLM Manual 6840, Special Status Species Management.)

- Apply BLM Rangeland Health Standards (BLM Manual 4180)(BLM 2001c) to recommendations and information from land health assessments to develop direction that enhances or restores physical function and biological health and achieves Land Health Standards at the watershed scale.
- Recognize valid existing rights including oil and gas leases, mineral leases, mining claims, and lands and realty actions.
- Integrate the management of the Planning Area with the GSRA and WRRRA by applying management techniques that are successful in other portions of these areas.

These goals and objectives are based on the direction provided by numerous laws, mandates, policies, and plans, including:

- National Environmental Policy Act (NEPA)
- Federal Land Policy and Management Act (FLPMA)
- Public Law 105-85 (Department of Defense Authorization Act of 1998)
- Mineral Leasing Act of 1920, as amended
- National Historic Preservation Act of 1966, as amended
- Federal Onshore Oil and Gas Leasing and Reform Act of 1987
- Endangered Species Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Clean Water Act, Clean Air Act, and other environmental laws
- BLM Planning Regulations (40 Code of Federal Regulations [CFR] 1600)
- BLM Grazing Administration Regulations (43 CFR 4180)
- BLM Land Use Planning Handbook, H-1601-1, updated January 5, 2001 (BLM 2001a) and March 11, 2005 (BLM 2005a)
- BLM Manual 1613 (Areas of Critical Environmental Concern)(BLM 1988b)
- BLM Manual 6840 (Special-Status Species Management)(BLM 2001b)
- BLM Manual 4180 (Rangeland Land Health Standards)(BLM 2001e)

The previously published Draft RMPA/EIS for the Roan Plateau Planning Area was prepared in compliance with guidance provided by the then-current version of the BLM Land Use Planning Handbook (BLM 2001a). The most recent update to this handbook was released in March 2005 (BLM 2005a), after publication of the Draft. In order to avoid confusion when referring to elements of the Draft RMPA/EIS, some aspects of the updated guidance were not incorporated into this document. For example, the suggested outline and organization of this Proposed Plan/Final EIS follow the earlier version of the handbook. However, more substantive aspects of the revised handbook, such as guidance for trails and travel management and socio-economic analysis, were complied with in this document.

1.3 NEED FOR THE ACTION

1.3.1 Transfer of NOSRs 1 and 3 from DOE to BLM

Public Law 105-85 (the “Transfer Act”) transferred management authority of NOSRs 1 and 3 from the DOE to the USDI (specifically BLM) in 1997. The total of 55,354 acres of land involved in the transfer comprised 36,362 acres in NOSR 1 and 18,992 acres in NOSR 3. These lands were added to the 18,248

acres (including Federal surface or mineral estate) previously managed by BLM in the Planning Area. The primary need for the current RMPA/EIS process is to develop an integrated land use plan that incorporates the transferred NOSRs into the remainder of BLM land in the Planning Area and establishes a unified set of goals, objectives, and land use or management actions.

The Transfer Act states, “Beginning on the date of the enactment of this section, or as soon thereafter as practicable, the Secretary of the Interior shall enter into leases with one or more private entities for the purpose of exploration for, and development and production of, petroleum (other than in the form of oil shale) located on or in public domain lands in Oil Shale Reserves Numbered 1 and 3 (including the developed tract of Oil Shale Reserve Numbered 3). Any such lease shall be made in accordance with the requirements of the Mineral Leasing Act (30 U.S.C. 181 et seq.) regarding the lease of oil and gas lands and shall be subject to valid existing rights” (Section 3404, Public Law 105.85). In addition, the act stipulates that the transferred lands be managed in accordance with FLPMA and other applicable laws that guide BLM’s management efforts.

Another provision of the Transfer Act mandated that the developed track of NOSR 3, located below the rim, be leased within one year. At the time NOSR 3 was transferred, a planning process was underway to evaluate increasing levels of oil and gas development in the western portion of the GSRA. As a result of the short timeframe mandated to lease NOSR 3 and the similarity in ecological characteristics of the area below the rim to adjacent BLM lands, an area of 12,029 acres within NOSR 3 already leased and being developed for oil and gas (“the production area”) was folded into that planning process. On March 24 1999, a ROD approved the RMP Amendment as analyzed in the 1999 FSEIS and pertaining to the 12,029 acres in the current production area of NOSR 3. The remaining lands in NOSR 3, all of the lands in NOSR 1, and non-NOSR Federal lands within the Planning Area would be subject to an additional planning process, specifically this RMPA/EIS process.

This RMPA/EIS focuses on currently unleased BLM lands in the Planning Area, comprising NOSR 1, portions of NOSR 3 outside the production area, and the non-NOSR Federal lands. However, certain resource and land use management decisions—specifically those not in conflict with vested property rights under existing oil and gas leases—would apply to the entire 73,602 acres of BLM lands.

The impact analyses of Chapter 4 also consider the currently leased areas. Most of the unleased portions of BLM lands lie in NOSR 1 above the Roan Cliffs. The area above the cliffs, including both Federal and private lands, is the area generally referred to in the vernacular as the “Roan Plateau.” The Roan Plateau Planning Area includes these areas of higher elevation as well as areas of lower elevation below the Roan Cliffs. The area transferred from DOE was historically managed by BLM, although under the authority of DOE and in accordance with the DOE’s OMP (DOE 1988). The OMP specified the administrative procedures and resource management direction for the areas.

1.3.2 Demographic and Economic Changes in the Planning Area

The rate of population growth of Garfield County has been faster than that of Colorado as a whole since 1970 (Sonoran Institute 2002). For the most recent decade (1990 – 2000), growth in Garfield County was 3.9 percent, compared to 2.7 percent for Colorado. More localized growth of western Garfield County was even higher – 4.5 percent during the 1990s. The I-70 corridor, where most of the population is concentrated, is growing for several reasons, including an influx of residents attracted to the rural character, natural beauty, and recreational and, increasingly, economic opportunities of the area. While the economy of the area was historically based on ranching, hunting and related services, and oil and gas development, the influx of new residents from other areas and associated with other economic sectors has brought different expectations about future development of the Planning Area.

Opinions expressed during public scoping for this document indicated that some residents would prefer a low level of development, while others would prefer that the RMP Amendments emphasize commodity

production to support economic growth. Conflicting community goals for the Planning Area have contributed to the need for an open, coordinated planning process.

1.3.3 Oil and Gas Leasing

The 1999 FSEIS addressed increasing levels of oil and gas development in the western portion of the Glenwood Springs Field Office (GSFO), including portions of NOSR 3 and, to a minor extent, NOSR 1 within the production area. Oil and gas leasing decisions, lease stipulations, and mitigation measures for public lands were included in the subsequent ROD of March 24, 1999.

At the time the 1999 FSEIS was prepared and the ROD issued, much of western Garfield County was already leased. The ROD established lease stipulations that apply to subsequent leases to the extent that they are consistent with existing lease rights or can be applied as Conditions of Approval (COAs) during permitting. The bulk of NOSRs 1 and 3 are not currently leased for oil and gas. Increasing demand and subsequent increases in drilling for oil and gas in western Colorado have resulted in the need for a management plan that facilitates orderly economic and environmentally sound exploration and development of oil and gas resources in these lands, using principles of multiple use.

In preparing the Proposed Plan, the BLM acknowledges, and has carefully considered, many public comments to the Draft RMPA/EIS that expressed concerns about potential impacts of oil and gas leasing and drilling to other land uses and natural resources in the Planning Area. A large number of comments state a preference for no leasing or drilling, especially on top of the plateau. BLM has concluded that to not make this area available for oil and gas development would fail to comply with the intent of the Transfer Act, as well as the agency mission of multiple use management. However, BLM has taken into consideration public comments, input by the Cooperating Agencies, and the most current technological information and data in preparing a Proposed Plan that would be as responsive as possible to these concerns while allowing significant recovery of the oil and gas resources of the Federal lands.

1.3.4 Interim Travel Designations

BLM land use planning regulations require the designation of public lands as open, closed, or limited for off-highway vehicle (OHV) use (43 CFR 8342.1). The purpose of travel designations is to protect fragile and unique resource values from damage by OHVs while providing opportunities for this type of use where appropriate. Permanent travel designations have not yet been made for the transferred lands (NOSRs 1 and 3), but interim closures and restrictions were established and published in the Federal Register on July 3, 2000 (volume 65, no. 128, pages 41081 – 41082). The interim management included closing the NOSRs to cross-country motorized and mechanized travel and restricting OHV travel to designated routes. These interim measures did not apply to other BLM lands in the Planning Area. For purposes of impact analysis, only the No Action Alternative assumed that the interim closures and restrictions would be vacated and that permanent designations for NOSRs 1 and 3 would allow cross-country OHV travel throughout the Planning Area.

1.3.5 Wilderness Character and Roadless Inventory

A wilderness inventory of the transferred NOSR lands was conducted during 1998, 1999, and 2000 to determine whether they contain the characteristics of wilderness as defined by the Wilderness Act of 1964. All other lands within the Planning Area had already been inventoried. The information contained in the wilderness inventory has been considered in the development and analysis of alternatives.

The Draft RMPA/EIS included an analysis of alternative management prescriptions for three areas (totaling 21,382 acres) found by BLM to contain wilderness characteristics. On April 14, 2003, a settlement agreement was reached between the USDI and the State of Utah, Utah School and Institutional Trust Lands Administration, and Utah Association of Counties. Consistent with that settlement and subsequent policies issued by BLM, neither the Draft RMPA/EIS nor the Proposed Plan/Final EIS

considers the designation of new Wilderness Study Areas (WSAs) or the classification or management of BLM lands as if they are, or may become, WSAs. However, the protection and management of wilderness characteristics was considered and analyzed for Alternatives II and III in the Draft RMPA/EIS.

1.3.6 New Information from Land Health Assessments

Land health assessments were conducted in portions of the Planning Area atop the plateau in 1999 and in the eastern portion of lands below the rim in 2001. These assessments were conducted in accordance with BLM statewide standards that describe the natural resource conditions needed to sustain public land health as adopted by BLM in Colorado and approved by the Secretary of the Interior in February 1997 (Land Health Standards, Appendix F). Information included in the assessments used to support this analysis, and ultimately the selection of a RMP amendment alternative, address upland soils, riparian systems, plant and animal communities, special status (threatened, endangered, candidate, or sensitive) species, and water quality.

1.4 PLANNING AREA

The Planning Area is generally bounded on the east by State Highway (SH) 13, on the south by the Colorado River, on the west by Parachute Creek, and on the north by the line between Township 4 South and Township 5 South of the Sixth Principal Meridian. A small area in the northeastern portion of the Planning Area extends into Rio Blanco County (Figure 1-2). The 73,602 acres of public land within the Planning Area includes 73,282 acres managed by the GSFO. This total includes 68,447 acres with BLM surface and minerals and an additional 4,455 acres with private surface but Federal minerals. An additional 320 acres of BLM surface and mineral estate is managed by the White River Field Office (WRFO) out of Meeker in Rio Blanco County.

Although the Planning Area includes both public and private lands, the RMPA guides only BLM efforts on the public lands that it administers. “Public lands” in this context include lands with a split estate (viz., private surface but Federal minerals), although BLM management authority on these lands is limited to activities (both surface and subsurface) related to exploration and development of the minerals. About 58 percent of the Planning Area (73,602 acres) is public land in the sense of either Federal surface, Federal minerals, or both. The proportion of public land is higher on top of the plateau (65 percent) than below the rim (53 percent).

The relationship between the Planning Area and the entire area managed by the GSFO is shown in the insert on Figure 1-2. The total area managed by the GSFO includes approximately 568,000 acres. The WRFO manages about 1.5 million acres.

Figure 1-3 shows the location of the line used to differentiate areas referred to throughout this RMPA/EIS as lying “above the rim” or “atop the plateau” versus “below the rim” or “below the cliffs.” This distinction is important for the Planning Area because of the very different resources and existing land uses associated with these two topographically and ecologically disparate areas. Note from Figure 1-3 that this line (“the rim”) is not present along the northern edge of the Planning Area, which is separated from adjacent lands to the north by a gradual slope rather than a sheer escarpment.

1.5 AGENCY ROLES AND RESPONSIBILITIES

NEPA requires that Federal agencies give appropriate consideration to environmental impacts in all their decision-making processes. BLM is the lead agency (as defined in NEPA) for the Proposed Plan and is therefore responsible for preparing an EIS that evaluates the effects of amending the two existing RMPs and conforms to the guidance set forth in the Act. BLM will use the evaluation in this RMPA/EIS to make an informed selection of resource management options and amend the existing RMPs.

The resource management plan amendments and their ultimate implementation are the sole responsibility of BLM. However, other agencies have authority under other laws to which BLM must adhere, and/or have special expertise or knowledge that is required for complete analysis and coordination of the alternatives. BLM is consulting with the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the ESA regarding potential adverse effects of the Proposed Plan/Final EIS.

BLM has entered into Cooperating Agency agreements with Garfield County, Rio Blanco County, the City of Rifle, the Town of Parachute, and the Colorado Department of Natural Resources (CDNR), which includes the Colorado Division of Wildlife (CDOW), the Colorado Oil and Gas Conservation Commission (COGCC), Colorado Geologic Survey (CGS) and the Colorado Department of Parks. BLM has also consulted with Mesa and Rio Blanco Counties and the City of Glenwood Springs.

1.6 BLM LAND USE PLANNING PROCESS

FLPMA mandates that public lands under the jurisdiction of BLM be managed according to land use plans that are developed with public input through a coordinated planning process. FLPMA further mandates that BLM lands are to be managed on the basis of “multiple use and sustained yield unless otherwise specified by law.” The set of regulations that implement FLPMA is found in 43 CFR 1600. These regulations outline the interdisciplinary, cooperative approach that BLM must take in preparing, maintaining, and using resource management plans, amendments, and revisions. The planning process outlined in these regulations consists of the following steps, not necessarily undertaken in a linear fashion:

- **Identify Issues** – BLM conducted public meetings and invited written comments early in the planning process. Comments from interested agencies and the public helped BLM identify key issues (i.e., concerns, conflicts, or opportunities pertaining to the management of public lands).
- **Develop Planning Criteria** – Planning criteria are the considerations that guide the overall planning process, the development of a reasonable range of alternatives, and analysis needed to address the planning issues. Planning criteria were formulated based on applicable laws and regulations, land use plans, coordination with other agencies, and public input.
- **Collect and Consolidate Data** – Based on the issues identified and the planning criteria, BLM reviewed and evaluated available data, including results of field surveys, published and unpublished studies, and consultations with staff from other agencies and organizations.
- **Prepare an Analysis of the Management Situation (AMS)** – The AMS provides a baseline for developing and evaluating management alternatives. It describes existing management plans and documents, current management approach, site characteristics and setting, resource condition and capabilities, and opportunities. The AMS for the Planning Area was published August 2002 (BLM 2002a).
- **Formulate Alternatives** – BLM planning team reviewed the issues raised during scoping by the public, other agencies, and within BLM. Based on the AMS, planning criteria, and goals and objectives of the RMP Amendment, five alternatives were formulated for detailed analysis. These alternatives described a reasonable range of management options to assist decision-makers and the public in understanding the positive and negative effects of future actions in the Planning Area.
- **Estimate Effects** – Each of the five alternatives analyzed in detail in the Draft RMPA/EIS, as well as the Proposed Plan presented in this document, have been evaluated for potential environmental consequences. The analysis addresses short-term (temporary) and long-term, onsite and offsite, direct and indirect, and positive (beneficial) and adverse (negative) impacts expected to result from each alternative. The analysis addresses these impacts individually as well as cumulative to past, present, or reasonably anticipated future impacts.

- **Select the Preferred Alternative and Conduct Public Review** – As required by NEPA and BLM planning regulations, the Draft RMPA/EIS identified a preferred alternative. Following consideration of public comments during a 90-day (extended to 120-day) review period for the Draft, BLM initiated a Cooperating Agency process that spanned an additional 6 months and included six formal meetings with the Cooperators (see Chapter 6). The Proposed Plan/Final EIS was developed following completion of the public comment and Cooperating Agency processes.
- **Prepare the Record of Decision (ROD)** – At the end of a 30-day protest period that follows publication of the Proposed Plan/Final EIS, BLM’s Colorado State Director will issue a ROD documenting the completion of the environmental review and adoption of a selected RMPA to be implemented. Issuance of the ROD may be delayed until protests are resolved.
- **Monitor and Evaluate** – As the approved RMPA is being implemented, BLM will monitor and evaluate how well the plan is guiding the Planning Area toward desired or acceptable resource conditions. If management issues are not being resolved or suitable conditions not being met, the RMPA may be further amended or revised within the constraints of valid existing rights.

1.7 NEPA PROCESS, DECISION-MAKING, SCHEDULE, AND PROTESTS

The NEPA process is intended to provide BLM with a detailed account of the environmental consequences that are associated with the alternative management plan amendments for the Planning Area. Regulations promulgated by the Council on Environmental Quality (CEQ)(40 CFR 1500 et seq.) provide guidance for all Federal agencies to comply with NEPA. BLM’s NEPA Handbook (H-1790-1) (BLM 1988c) provides the specific guidance for BLM implementation of NEPA.

Any person who participated in the planning process may protest an RMP Amendment within 30 days of the date of the Notice of Availability (NOA) for the Proposed Plan/Final EIS containing the amendment published in the Federal Register by the U.S. Environmental Protection Agency (EPA). The protest may raise only issues that were submitted for the record during the planning process. Protests must be in writing and addressed to the BLM Director. Letters of protest must fulfill the content requirements established in 43 CFR 1610.5-2 (a). The protest must contain:

- the name, mailing address, phone number, and interest of the person filing the protest
- a statement of the part or parts of the plan and the issues being protested
- a copy of all documents addressing the issue(s) that the protesting party submitted during the planning process or a statement of the date they were discussed for the record
- a concise statement explaining why the protestor believes that the State Director’s decision is wrong

A 30-day protest period and 60-day Governor’s Consistency Review period will follow the NOA for the Proposed Plan/Final EIS. Once any protests are resolved, the State Director will issue a ROD that sets forth the Resource Management Plan decisions.

1.8 SUMMARY OF SCOPING ISSUES

1.8.1 Overview of Scoping and Issue Identification Process

NEPA requires that Federal agencies hold an open and early process for determining the scope of issues to be addressed in an EIS and for identifying the significant issues that could be associated with the action. The term “scope” is defined as the range of actions, alternatives, and impacts to be considered in an EIS.

BLM initiated formal scoping for this RMPA/EIS on November 16, 2000, with a notice in the Federal Register inviting the participation of affected Federal, State, and local agencies, any affected Indian tribe, the proponent of the action (BLM), and other interested persons. The formal scoping period ended on January 31, 2001. A public open house was held on December 13, 2000, during which BLM accepted verbal comments. BLM received written comments throughout the period.

An additional public comment period, publicized by legal notices, was held for 30 days beginning October 14, 2002. During this comment period, BLM summarized amended planning criteria and preliminary alternatives and requested additional comments on the scope of the RMPA/EIS. During this period, BLM held public meetings in Rifle on October 22, in Parachute/Battlement Mesa on October 23, and in Glenwood Springs on October 24, 2002.

Beginning in November 2001, BLM launched a public website with information about the planning process for Planning Area. An additional public website was created on December 4, 2002, to provide specific information on the RMPA/EIS process.

Based on the comments received during scoping, BLM identified environmental issues to be analyzed in the EIS. The scoping comments also guided BLM in determining the appropriate depth of analysis for each issue and which issues were outside of the scope of the Proposed Plan. As discussed in Chapter 2, the issues identified during the scoping process were taken into consideration during alternative formulation.

1.8.2 Planning Issues Considered in this Proposed Plan/Final EIS

Table 1-1 summarizes issues raised by interested parties and agency staff during the scoping process, including those considered in the RMPA/EIS and those eliminated from further consideration. It also lists the planning criteria used in developing the Draft RMPA/EIS and Proposed Plan/Final EIS. These issues were considered in formulating the alternatives, and the evaluation of those alternatives, as well as in developing a Proposed Plan. Table 1-2 summarizes BLM's planning criteria as applied to the process.

1.9 CHANGES AND CORRECTIONS TO THE DRAFT RMPA/EIS

To enhance readability of the document by reducing its length, most of the text and tables in Chapter 4 (Environmental Consequences) pertaining specifically to Alternatives I through V were removed. Therefore, the Proposed Plan/Final EIS focuses heavily on the Proposed Plan. However, reference is made throughout Chapter 4 to components of Alternatives I through V where helpful to an understanding of key differences and a comparison of impacts among alternatives.

In addition to removing much of the detailed information on the previous alternatives, preparation of the Proposed Plan/Final EIS included incorporating a number of other changes and corrections and updating some new information. These are described below.

1.9.1 Expanded or Updated Information

Expanded or updated information incorporated into the Proposed Plan/Final EIS includes the following:

- Information on existing oil and gas development was updated to incorporate more recent data on number of wells already completed in the Planning Area and to reflect other oil and gas development in the region.
- The sections on socioeconomic (3.4.3 and 4.4.3) were expanded to include additional information on impacts to local communities, including an expanded discussion of hunting-related revenues.

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- Information regarding big game security areas mapped by CDOW on BLM lands was updated to include 11,404 acres along stream valleys atop the plateau as well as the previously included 11,481 acres in rugged, wooded terrain along and below the cliffs.

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Table 1-1. Planning Issues Raised by Interested Parties and BLM Staff during Scoping

Primary Issues	<ul style="list-style-type: none"> • Oil and Gas Development • Wilderness and Roadless Areas • Recreational Opportunities • Travel and Transportation • Influences of Changing Population, Growth, and Development to Public Lands • Fish and Wildlife Habitat • Livestock Grazing Management • Visual Aesthetics • Economic Benefits from Gas Leasing, Grazing, Recreation, and/or Tourism • Ecological Richness/Uniqueness/Diversity
Related Topics	<ul style="list-style-type: none"> • Watershed, Water Resources, and Water Pollution • Vegetation/Forest Management • Air Quality • Local Quality of Life/Livelihoods • Loss of Traditional Uses and Activities • Maintaining Current Activities, Setting, and Management • Areas/Routes Open for Motorized Use, Mountain Bikes/Seasonal Restrictions • Protection of Rare and Sensitive Species • Protection of Natural Features • Protection of Paleontological/Archeological Resources • Wildland Fire and Prescribed Fire Management • Conflicts between Users • Rights-of-Way, Communication Sites, Utility Corridors • Reclamation of Unneeded Routes, Improvements, and Human Impacts • Meeting Land Health Standards • Livestock Grazing Carrying Capacity and Conflicts • Soils/Erosion • Reclamation of Spent Shale Pile and DOE Facilities
Implementation Topics	<ul style="list-style-type: none"> • Connecting Trails to Rifle • Level of Maintenance on Routes • Recreational Facilities • Signage • Litter and Trash Dumping • Livestock Distribution and Improvements • Enforcement of Regulations • Gas Development Spacing, Directional Drilling, and Stipulations • Partnerships/Involving Users in Implementation • Habitat Improvement Projects • Gas Development Mitigation
Planning Topics	<ul style="list-style-type: none"> • Reconfirming Existing RMP Decisions • Multiple-Use Management • Increased and Changing Demands of Public Lands • Sustainability • Cumulative Impact of Oil and Gas Development • Balance of Recreational Opportunities • Intent of Transfer Legislation • Need to Revise Reasonable Foreseeable Development Scenario for Gas Leasing

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Table 1-2. Planning Criteria Used by BLM in Developing and Implementing the RMPA/EIS

Area of Analysis	<ul style="list-style-type: none"> The planning process will address all BLM-administered lands, including lands with Federal surface and/or mineral estates within the Planning Area. This area can generally be described as being between Parachute Creek, SH 13, and the Colorado River, totaling 73,602 acres of Federal lands.
Decisions to be Made	<ul style="list-style-type: none"> Establish travel designations that replace interim travel designations on transferred lands and affirm or change travel designations on lands in the rest of the Planning Area. Establish conservation/mitigation measures if any, and as appropriate, for all species listed as sensitive, candidate, proposed, threatened, or endangered in order to prevent the listing of sensitive, candidate, and proposed species. Adopt measures as appropriate to conserve species currently listed under the Endangered Species Act as Threatened or Endangered (see August 30, 2000, Interagency MOA for Programmatic Endangered Species Act (ESA) Section 7 Consultation). Adopt, modify, or discard previous land use planning decisions as appropriate. Identify areas, conditions, and criteria where resource activities and development (oil and gas development, range improvements, vegetation treatments, recreation developments and other surface-disturbing activities) are appropriate. Designate special management areas, as appropriate, potentially including ACECs and SRMAs. Establish management prescriptions for those areas BLM has determined to contain wilderness characteristics. Provide management direction to maintain, enhance, or restore physical function and biological health and achieve Land Health Standards at the watershed scale. This will include adoption of the Standards for Public Land Health and Livestock Grazing Management in Colorado.
Process Criteria of Note	<ul style="list-style-type: none"> Comply with all applicable laws, regulations, manuals, handbooks, and policies, including but not limited to the Federal Land Policy and Management Act, Public Law 105-85 (Defense Authorization Act of 1998), Mineral Leasing Act of 1920 as amended, Onshore Oil and Gas Leasing and Reform Act of 1987, ESA, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Clean Water Act, Clean Air Act, and other laws. Provide for a balance and diversity of resource uses while realizing that some uses may not be compatible and may not be offered within the Roan Plateau area. Base decisions on the relative values of resources present, not necessarily to the combination of uses that will give the greatest economic return (Planning Regulations, 43 CFR 1600) in development of management prescriptions. Recognize valid existing rights. Use multiple geographic scales to assess the results of various alternatives that may differ from the Planning Area for analysis, appropriate to specific resources and to address complex issues. Consider budget when analyzing the feasibility of implementation.

- A new chapter (Chapter 6) was created to describe the Consultation and Coordination process that followed publication of the Draft RMPA/EIS.
- Information regarding BLM’s Reasonable Foreseeable Development (RFD) (BLM 2003a) was updated to reference the version dated November 2005 (replacing the earlier version of February 2004). The current RFD is provided in Appendix H of this document.
- A new appendix (Appendix I) was added to provide information regarding BMPs, and three new appendices (Appendices J, K, and L) were added to describe resource monitoring programs to be implemented under the Proposed Plan. Appendix M was added and it describes financial and programmatic resources available to local governments. Appendix G was removed, but the title page remains so that the order of the appendices is not changed.

1.9.2 Substantive Corrections, Clarifications, and Additional Analyses

Notable corrections of typographical errors and incorrect or misleading statements, clarifications or changes in terminology, and other substantive revisions in going from the Draft RMPA/EIS to the Proposed Plan/Final EIS included the following:

- Replacement of Terms “High-Risk” and “Moderate-Risk” with “High-Value” – At multiple places in the Draft, these terms were used to describe relative habitat importance for specific resources, particularly Colorado River cutthroat trout, riparian/wetland areas, and watershed processes. The word “risk” was used to connote the likelihood that impacts to one resource would adversely affect another resource. For example, damage to “high-risk” habitat for the Colorado River cutthroat trout would have a high likelihood of impacting the trout. To avoid confusion with a more common usage of the term—viz., that “high-risk” habitat has a high risk of being damaged—“risk” has been replaced with “value.”

In addition to substituting the word “value” for “risk,” the Proposed Plan/Final EIS combines areas previously described as high-risk and moderate-risk habitats into a single (“high-value”) category. This change arose from the Consultation and Coordination process following publication of the Draft RMPA/EIS. Furthermore, in the case of the Colorado River cutthroat trout, the Proposed Plan protects the entire “high-value” area for this species with an No Ground Disturbance/No Surface Occupancy (NGD/NSO) restriction (as was done under Alternative II), rather than reserving the NGD/NSO for the high-risk portion and applying a less restrictive Site-Specific Relocation/Controlled Surface Use (SSR/CSU) to the moderate-risk portion (as was done under Alternative III).

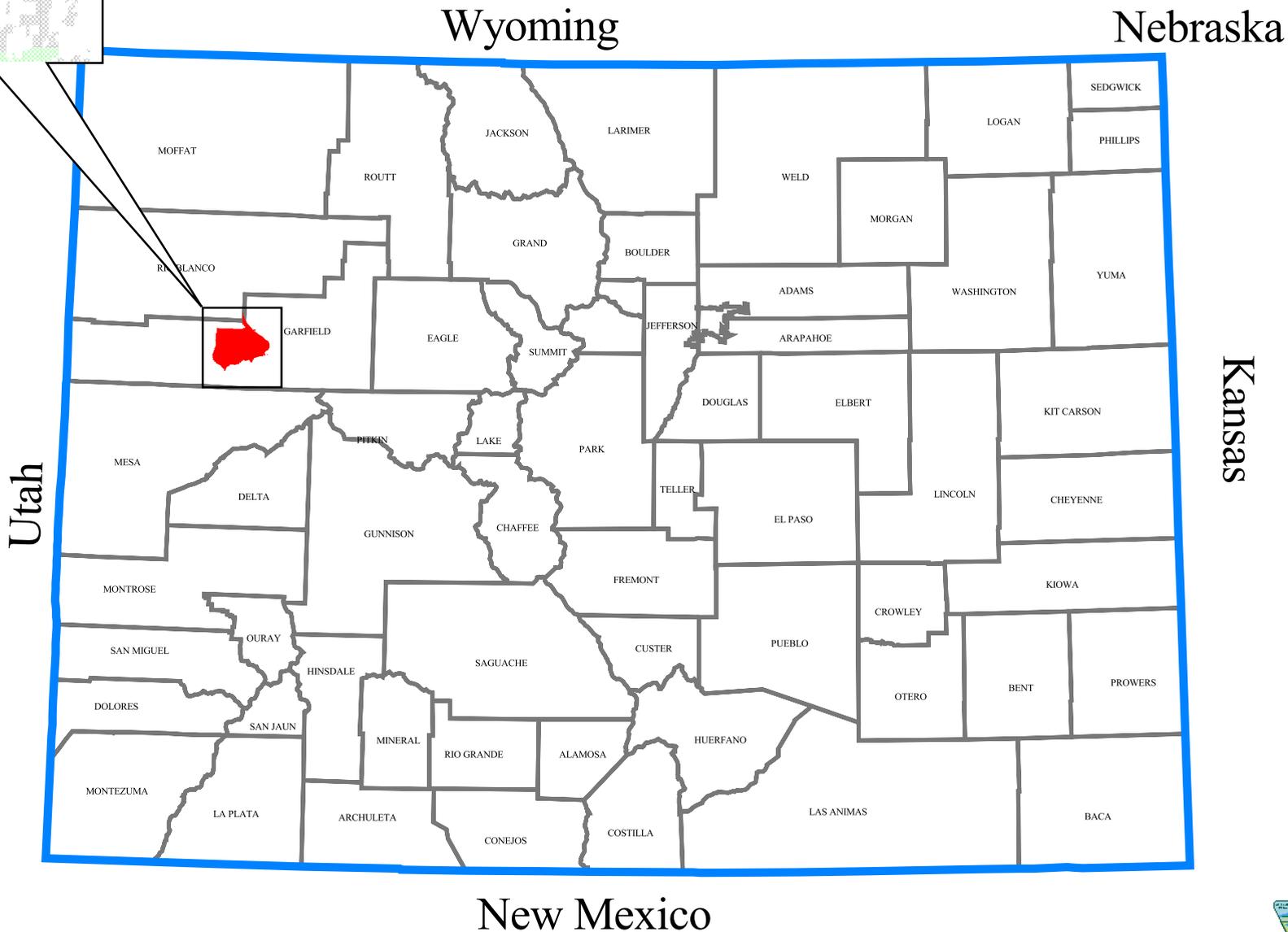
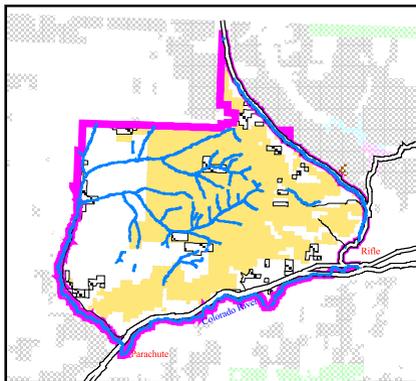
- Correction of Erroneous Number Regarding Loss of Big Game Winter Range – The discussion of wildlife impacts under Alternative III of the Draft stated correctly on page 4-83 that the Preferred Alternative would result in a decrease of approximately 22.3 percent of the big game winter range on BLM lands below the rim, including both direct and effective habitat loss. Unfortunately, the summary statement on page 4-87 described the loss as approximately 33 percent, which was meant to apply to all lands in the Planning Area, not just BLM lands. The correct estimate of 22.3 percent was the basis for assigning an impact level of “moderate” in Tables 4-14 and 4-17 of the Draft. In the same tables, the impact summary for deer and elk winter range under Alternative IV reported the level as “moderate,” when it should have been described as “moderate to major” based on an estimated 36 percent habitat loss. The versions of these tables in the Proposed Plan/Final EIS (Tables 4-12 and 4-13) correct these errors.
- Correction to Area of Winter Range Protected by Seasonal Restriction – For the Proposed Plan and other alternatives except Alternative V, a seasonal restriction on ground-disturbing activities, including oil and gas drilling and other construction, would be applied to the 34,668 acres of big

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game (deer/elk) winter range mapped on BLM lands by CDOW. Although the Draft RMPA/EIS stated that this protection would apply to 24,978 acres of “crucial” winter range (severe winter range plus winter concentration areas), the impact analysis was based on protecting all winter range.

- Clarification of Winter Range Losses versus Population Declines – Some language in the Draft RMPA/EIS was imprecise in describing estimated impacts to deer from reductions in winter range. To equate decreases in habitat with decreases in deer populations requires a number of assumptions meant to ensure that impacts are not underestimated. Among these is the assumption that all of the winter range is currently at carrying capacity and that unaffected areas are unable to absorb any increase in use. Another assumption is that the impact of habitat loss accruing over 20 years is the same as if it happened all at once, with no opportunity for the wildlife to adjust their patterns of habitat use. Because of the compounding of these and other such assumptions, the potential decrease in winter range under the Proposed Plan or any other alternative would be very unlikely to result in the same decrease in deer numbers.
- Re-analysis of Disturbance-Avoidance Impacts – Another issue involving winter range in the Draft RMPA/EIS is the method used to calculate effective habitat loss (i.e., habitat that remains intact but receives less use by wildlife due to human activity). The method used in the Draft multiplied the area of long-term surface disturbance at Year 20 by a factor of 3.5 and applied that number for the entire 20-year period. That method was derived from a publication describing effective habitat fragmentation resulting from roads and timber clearcuts in a forest. CDOW commented that the method was likely to underestimate impacts and recommended use of larger disturbance-avoidance zones, such as reported in studies of impacts of oil and gas development in Wyoming. Because the method recommended by CDOW results in somewhat greater impact estimates, the Proposed Plan/Final EIS uses this method to estimate effective habitat loss for both big game winter range below the cliffs and elk summer range atop the plateau.
- Correction to Table 4-34 (Table 4-27 of Proposed Plan/Final EIS) – The right-hand column of Table 4-34 of the Draft RMPA/EIS lists the typical number of average daily vehicular trips associated with drilling 80 gas wells. Unfortunately, the numbers in that column are too high by a factor of 10 due to an arithmetic error. The replacement table corrects the error and also differs by using the actual estimate of the number of wells per year under the Proposed Plan (78.5) instead of the more generic value of 80 wells per year used in the Draft.
- Correction to Vehicular Traffic on Nearby Highways – Because of the error in calculating average daily vehicle-trips described above, calculations related to impacts on selected highways discussed for each alternative in Section 4.4.4 of the Draft RMPA/EIS are also too high by a factor of 10. The discussion regarding the Proposed Plan in the Proposed Plan/Final EIS uses the correct figures.
- Correction to Table 4-18 (Table 4-20 of Draft RMPA/EIS) – The viewshed analysis summarized in Section 4.4.1 in the Proposed Plan/Final EIS differs from that in the Draft in two ways:
 - First, the analysis no longer includes wells below the rim as being visible from the Rim Road. This aspect of the Draft was an artifact of pixel size (spatial scale), which treated the Rim Road as essentially identical to the rim (top of the cliffs). The actual closest approach of the road to the rim is about 50 feet, and the typical separation is more than 100 feet. This makes it impossible to see the lower area from a vehicle on the road.
 - Second, well pads visible from both Interstate 70 (I-70) and SH 13 are no longer double counted. Considerable overlap in these viewsheds (see Maps 24 and 25) results because the two roads intersect, with long sections having the same view across open country toward distant cliffs. To avoid this double-counting, the revised table and text are based on an analysis in which visible lands below the cliffs are divided into two distinct areas: (1) sites visible only or primarily from I-

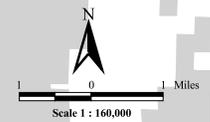
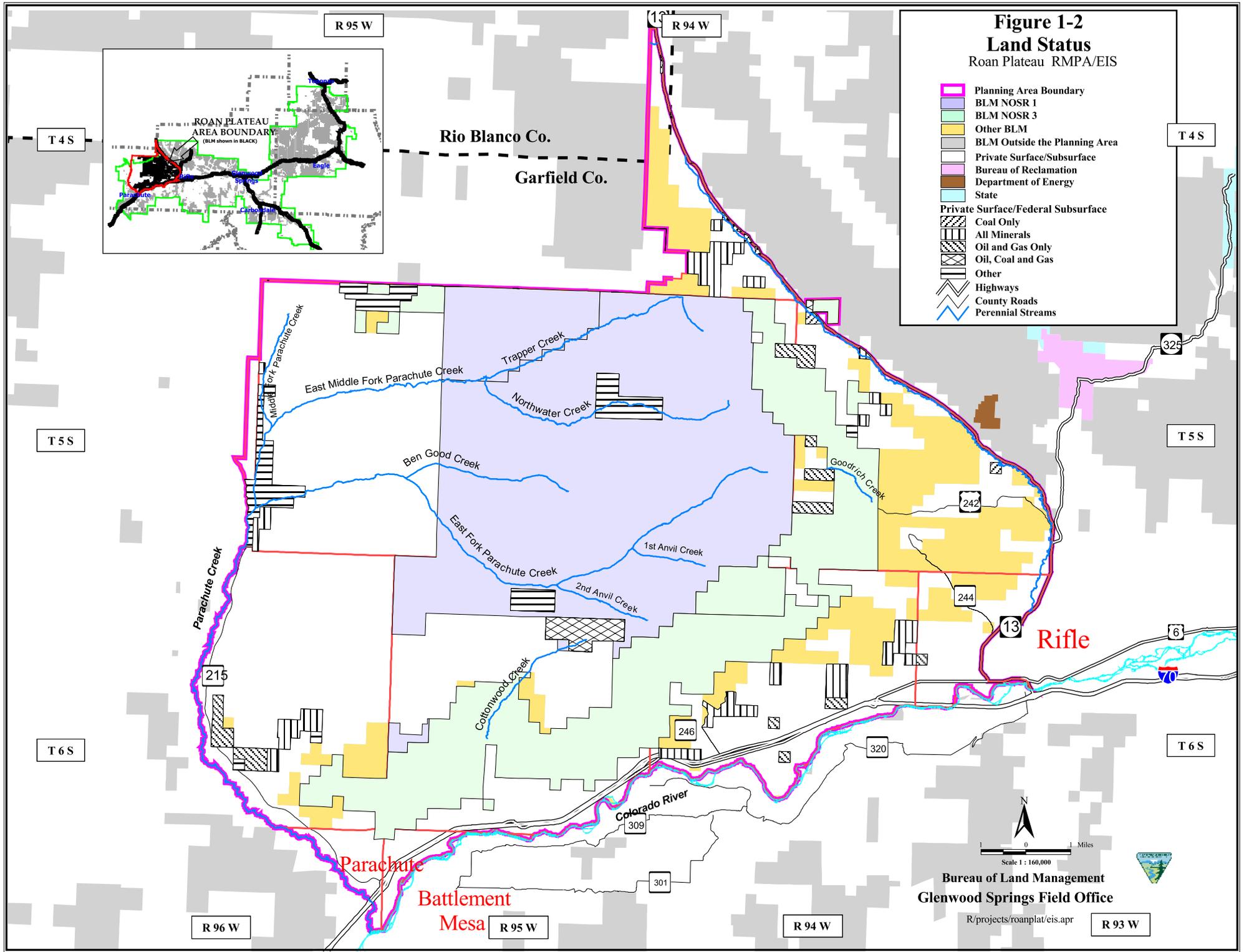
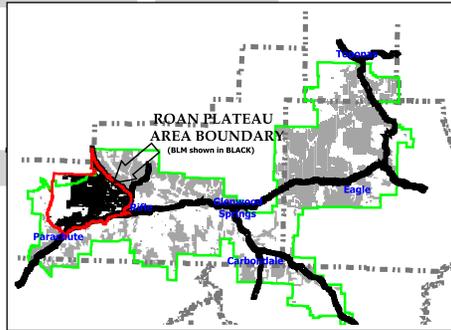
Figure 1-1 General Location Map Roan Plateau RMPA/EIS



**Figure 1-2
Land Status**

Roan Plateau RMPA/EIS

-  Planning Area Boundary
-  BLM NOSR 1
-  BLM NOSR 3
-  Other BLM
-  BLM Outside the Planning Area
-  Private Surface/Subsurface
-  Bureau of Reclamation
-  Department of Energy
-  State
-  Private Surface/Federal Subsurface
-  Coal Only
-  All Minerals
-  Oil and Gas Only
-  Oil, Coal and Gas
-  Other
-  Highways
-  County Roads
-  Perennial Streams



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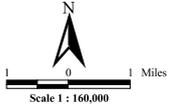
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Figure 1-3
General Planning Area View
with Topography
Roan Plateau RMPA/EIS

Legend
[Pink outline] Planning Area Boundary
[Yellow outline] Rim Boundary



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