

# 1 PURPOSE AND NEED

## 1.1 OVERVIEW OF THE PROPOSED RMPA/FSEIS

This Proposed Resource Management Plan Amendment (Proposed RMPA) and Final Supplemental Environmental Impact Statement (FSEIS) evaluates the environmental consequences of amending the existing Resource Management Plan (RMP) 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. This evaluation of environmental consequences supplements the original Final Environmental Impact Statement (FEIS) for the RMPA (BLM 2007a), hereafter referred to as the Roan FEIS.

The U.S. Department of the Interior (USDI) Bureau of Land Management (BLM) is amending the existing RMPs for the Planning Area in accordance with the Federal Land Policy and Management Act (FLPMA). In this case, an amendment is needed to address 73,800 acres of lands for which management was transferred to BLM from the U.S. Department of Energy (DOE). BLM-administered lands within the Planning Area include 73,800 acres with a Federal surface and mineral estate or with a Federal mineral estate and private surface estate.

The development of the RMPA for the Roan Plateau Planning Area began with a Notice of Intent (NOI) and public scoping in 2000. The Draft RMPA/EIS was published in November 2004 (BLM 2004). The Final RMPA/EIS (Roan FEIS) was published in August 2006 (BLM 2006). Following publication of the RMPA/FEIS, the BLM issued two Records of Decision (RODs), the first in June 2007 (BLM 2007a), which included management decisions for the majority of resources in the Planning Area, and the second in March 2008, which pertained to Areas of Critical Environmental Concern (ACECs) only (BLM 2008a).

A lawsuit was filed in July 2008 that challenged the BLM's oil and gas leasing and management decisions for the Roan Plateau. On June 22, 2012, the U.S. District Court issued a decision (*Colorado Environmental Coalition v. Salazar*, 875 F. Supp. 2d 1233; D. Colo. 2012), hereinafter called the Judicial Order, that upheld BLM's interpretation of the National Defense Authorization Act for Fiscal Year 1998, Pub. L. No. 105-85, 111 Stat. 1629 (1997) (Transfer Act) and its consideration of a No Leasing Alternative. However, the Judicial Order set aside the RMPA, including provisions for issuing leases for oil and gas fluid minerals, and remanded the matter to the BLM for further action to address noted deficiencies. Because the court set aside the RMPA, no land use plan exists for the Planning Area.

In view of the Court's ruling, the BLM determined that a supplemental analysis under the National Environmental Policy Act (NEPA), and a new proposed RMPA, were warranted. This document represents the development of a Proposed RMPA/FSEIS for the Planning Area. Because the goal of this process is to supplement the Roan FEIS, much of this Proposed RMPA/FSEIS integrates the language and analyses of the original RMPA/EIS process. This Proposed RMPA/FSEIS is updated to reflect supplemental analyses required by the Judicial Order, significant new resource information, and revised maps and tables.

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;

## CHAPTER 1 • PURPOSE AND NEED

- Glenwood Springs Resource Area Oil and Gas Leasing and Development ROD and RMPA, 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 updates to certain data;
- White River Resource Area RMP (BLM 1996a) (ROD issued July 1997), hereafter referred to as the 1997 WRRR RMP;
- Operational Management Plan for Naval Oil Shale Reserves 1 and 3 (DOE 1988); and
- Colorado Public Land Health Standards and Guidelines for Livestock Grazing Management Decision Record and Finding of No Significant Impact (BLM 1997).

The Planning Area boundary is shown on Figures 1-1 through 1-3 (located at the end of this chapter). Figure 1-1 illustrates the Planning Area location. Figure 1-2 shows surface land ownership status and subsurface Federal minerals within the Planning Area. This figure also illustrates the location of the line used to differentiate areas referred to throughout this RMPA/SEIS as “above the rim” versus “below the rim,” or “atop [on top of] the plateau” versus “below the rim.” This line (“the rim”) represents the top of the Roan Cliffs. Figure 1-3 summarizes the general topography of the Planning Area. As also shown on Maps 1 through 36 in Appendix A, the Planning Area encompasses a total of 126,890 acres. This total includes 66,780 acres with Federal surface and minerals, multiple parcels totaling 7,020 acres with private surface and Federal minerals, and a total of 53,090 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 73,800 acres of Federal lands in the Planning Area include 56,540 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 under the Transfer Act. The NOSRs have not previously been the subject of a coordinated planning process and are currently managed under the guidance of the above mentioned plans. The decision to set aside the RMPA has resulted in the absence of a valid comprehensive land use planning document for the Planning Area.

Non-NOSR BLM lands are primarily located 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 on 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 of split estate lands by BLM 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.

NEPA requires the preparation of the Environmental Impact Statement (EIS) component of this document because implementation of a selected RMPA would constitute a major Federal action significantly affecting the environment.

This chapter of the Proposed RMPA/FSEIS describes the purpose of the action (Section 1.2), the need for the action, including details and considerations of the supplemental nature of the SEIS (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), and the scoping process that helped shape the process and this document from its inception. Because this document is a supplement, it incorporates as much of the Roan FEIS as possible, updated to address issues identified in the Judicial Order, and reflects new, significant resource information (Section 1.3), revised maps and tables, updates to regulations and guidance, and specific elements of a settlement agreement among the parties to the litigation (*Conservation Colorado Education Fund et al. v. Sally Jewell, Bill Barrett Corporation, and Oxy USA Inc. et al.* 2014 [*Conservation Colo. Ed. Fund. v. Jewell, Nos. 12-1322, -1339 (10th Cir. Nov. 19, 2014)*]) (Appendix K).

Chapter 2, Alternatives, describes the four alternatives evaluated in detail in the Proposed RMPA/FSEIS. This chapter 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. In general, the current conditions described in Chapter 3 represent environmental and social conditions in the Planning Area at the time the 2006 RMPA/EIS was prepared. Changed conditions, in terms of significant new resource information since 2006, are discussed in Section 1.3.7.

Chapter 4, Environmental Consequences, evaluates how and to what extent baseline conditions would be altered by each of the four analyzed alternatives. These changes include direct and indirect, onsite and offsite, short-term, temporary, and long-term, and adverse and beneficial impacts, both individually and cumulatively to other impacts.

Chapter 5, References, lists the sources of information used in preparing this RMPA/SEIS.

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 Proposed RMPA/FSEIS chapters described above.

## 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 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;

## CHAPTER 1 • PURPOSE AND NEED

- Comply with the provisions of the Transfer Act, which transferred approximately 56,540 acres within NOSRs 1 and 3 from DOE to USDI; and
- 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 Areas (SRMAs) or other management determinations, as applicable, such as for stream segments eligible for designation under the Wild and Scenic Rivers Act (WSRA), Watershed Management Areas (WMAs), Back Country Byways, and management to protect wilderness characteristics;
- Establish travel designations that replace interim travel designations on transferred lands and affirm or change travel designations on lands in the remainder 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 ESA Section 7 Consultation and BLM Manual 6840, Special Status Species Management);
- Apply BLM Rangeland Health Standards (BLM Manual 4180-1) (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; and
- 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);
- National Defense Authorization Act for Fiscal Year 1998, Pub. L. No. 105-85, 111 Stat. 1629 (1997) (Transfer Act);
- Mineral Leasing Act of 1920, as amended;
- Energy Policy Act of 2005;

## CHAPTER 1 • PURPOSE AND NEED

- National Historic Preservation Act of 1966 (NHPA), as amended;
- Federal Onshore Oil and Gas Leasing and Reform Act of 1987 (FOOGLRA);
- Endangered Species Act (ESA), Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act (MBTA), Clean Water Act (CWA), Clean Air Act (CAA), and other environmental laws;
- BLM Planning Regulations (40 Code of Federal Regulations [CFR] 1600);
- BLM Grazing Administration Regulations (43 CFR 4100);
- BLM Land Use Planning Handbook, H-1601-1, updated January 5, 2001 (BLM 2001a) and March 11, 2005 (BLM 2005a);
- BLM Manual 1613, (ACECs) (BLM 1988b);
- BLM Manual 6840 (Special Status Species Management) (BLM 2008b); and
- BLM Manual 4180 (Rangeland Land Health Standards) (BLM 2009).

The previously published Draft RMPA/EIS (BLM 2004) for the 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 RMPA/EIS. 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 the Proposed Plan/Final EIS follow the earlier version of the handbook. However, BLM adhered to more substantive aspects of the revised handbook, such as guidance for trails and travel management and socioeconomic analysis, in the Final RMPA/EIS, and this Proposed RMPA/FSEIS.

### 1.3 NEED FOR THE ACTION

The need for the original RMPA/EIS is described in the following sections. The need for the SEIS analysis is summarized in Section 1.3.7.

#### 1.3.1 Transfer of NOSRs 1 and 3 from DOE to BLM

The Transfer Act transferred management authority of NOSRs 1 and 3 from the DOE to the USDI (specifically BLM) in 1997. The total of 56,540 acres of land involved in the transfer comprised 36,200 acres in NOSR 1 and 20,340 acres in NOSR 3. These lands were added to the 12,920 acres (including Federal surface or mineral estate) previously managed by BLM in the Planning Area. The primary need for the current RMPA/SEIS 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 United States Code [U.S.C.] 181 et seq.) regarding the lease of oil and gas lands and shall be subject to valid existing rights”. In addition, the Transfer Act stipulates

that the transferred lands be managed in accordance with the FLPMA and other applicable laws that guide BLM's management efforts.

Another provision of the Transfer Act mandated that the developed tract 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. Due to 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 16,010 acres within NOSR 3 that was 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 RMPA, as analyzed in the 1999 FSEIS (BLM 1999a) and pertaining to the 16,010 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 the 2006 RMPA/EIS process, supplemented by the current RMPA/SEIS process.

The Roan FEIS focused on then-unleased BLM lands in the Planning Area, comprising NOSR 1, portions of NOSR 3 outside the production area, and 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 73,800 acres of BLM lands.

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 generally referred to in the vernacular as the "Roan Plateau." The Planning Area includes these areas of higher elevation as well as areas of lower elevation below the Roan cliffs. The area transferred from the DOE was historically managed by the BLM, although it was under the authority of the DOE and in accordance with the DOE's Operational Management Plan (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**

From 1990 to 2000, population growth for Garfield County outpaced the State of Colorado as a whole (Sonoran Institute 2002). For this period, 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. More recently, Garfield County's population grew to about 56,000 in 2010 from about 44,000 in 2000, or 29 percent. At the same time, Mesa County's population grew to about 147,000 in 2010 (up 26 percent from 2000), and Rio Blanco County's population grew to about 7,000 (up 11 percent).

The Interstate 70 (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, recreation and, increasingly, economic opportunities of the area. While the area's economy was historically based on ranching, hunting, and related services, as well as oil and gas development, the influx of new residents associated with other economic sectors has presented differing expectations regarding future development of the Planning Area.

Opinions expressed during public scoping for the RMPA/SEIS indicated that some residents would prefer a low level of development, while others would prefer that the RMPA emphasize commodity production to support economic growth. Conflicting community goals for the Planning Area have emphasized the importance of 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), renamed as the Colorado River Valley Field Office (CRVFO) in 2010, 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 dated March 24, 1999.

At the time that the 1999 FSEIS was prepared and the ROD was issued, much of western Garfield County was already leased. The ROD established lease stipulations that applied to subsequent leases, and could be applied as Conditions of Approval (COAs) during permitting of development on preexisting leases, to the extent that they were consistent with existing lease rights. However, the bulk of NOSRs 1 and 3 were not leased for oil and gas under that ROD. 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 Roan FEIS, the BLM acknowledged, and carefully considered, many public comments to the Draft RMPA/EIS (BLM 2004) that expressed concerns about potential impacts of oil and gas leasing and development to other land uses and natural resources in the Planning Area. A large number of comments stated a preference for no leasing or drilling, especially on top of the plateau. BLM concluded that making this area unavailable for oil and gas development would not comply with the intent of the Transfer Act. However, BLM did take into consideration public comments, input by the Cooperating Agencies, and the most current technological information and data when preparing a Proposed Plan (i.e., the final preferred alternative) that was 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 Characteristics

A wilderness characteristics inventory of the transferred NOSR lands was conducted during 1998, 1999, and 2000 to determine whether these lands contained the characteristics of wilderness, as defined by the Wilderness Act of 1964. In 2013, the CRVFO took a new look at the 2000 inventory for lands with wilderness characteristics completed for the Planning Area to ensure compliance with the new BLM Manual 6310: Conducting Wilderness Characteristics Inventory on BLM Lands (BLM 2012b). A new inventory unit called the North Unit was inventoried and found not to contain wilderness characteristics. The information contained in the updated inventory of lands with wilderness characteristics has been considered in the development and analysis of the alternatives analyzed in this Proposed RMPA/FSEIS.

The Draft RMPA/EIS (BLM 2004) included an analysis of alternative management prescriptions for three areas (totaling 19,320 acres) found by BLM to contain wilderness characteristics. Consistent with BLM policy the Proposed RMPA/FSEIS does not consider 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, alternative decisions for protection and management of lands with wilderness characteristics are considered and analyzed.

### **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. In 2013, the CRVFO revisited the Land Health Standards for the five grazing allotments on top of the cliffs as documented in the 2013 Roan Cliffs Land Health Assessment (BLM 2013a). 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 (BLM 1997). These assessments examined upland soils, riparian systems, plant and animal communities, special status (threatened, endangered, candidate, or sensitive) species, and water quality.

### **1.3.7 Supplemental Environmental Impact Statement**

BLM is supplementing the Roan FEIS in response to the Judicial Order. As noted above, the Judicial Order set aside the RMPA and remanded the matter to the BLM to more fully address three issues:

1. The “Community Alternative” that various local governments, environmental organizations, and individual members of the public recommended;
2. The cumulative air quality impacts of the RMPA decision in conjunction with anticipated oil and gas development on private lands outside the Planning Area; and
3. Potential ozone impacts from proposed oil and gas development.

This SEIS addresses the information and alternatives analyzed in the Roan FEIS, supplemented with additional analyses in response to the Judicial Order. In accordance with BLM’s NEPA Handbook H-1790-1 (BLM 2008c), BLM must address significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its effects (40 CFR 1502.9(c)(1)(ii)). These new circumstances and information are integrated into this Proposed RMPA/FSEIS, including the following:

- Significant new data;
- Changed resource conditions;
- Changed regulatory status (e.g., threatened and endangered [T&E] species status) or other new regulations; and
- Changes in use of public land that occurred since the Roan FEIS and other associated management/activity plans were completed.

#### **1.3.7.1 New Information**

The CRVFO conducted internal scoping to determine whether new information was available and whether it was relevant to the SEIS analysis. This information is documented in the Analysis of New

## CHAPTER 1 • PURPOSE AND NEED

Information (ANI) (BLM 2014c) and was included as an appendix to the Scoping Report (BLM 2014a). New and significant information brought forward from this assessment is briefly summarized below:

- Resource mapping has been updated with new information/data. This updated information is described in applicable resource sections in Chapter 3 of this Proposed RMPA/FSEIS.
- Geographic Information System (GIS) analyses and maps were updated to account for the advances in GIS mapping technology. These changes are small and do not change the analysis.
- Air Quality and Climate. New Colorado Air Resource Management Modeling Study (CARMMS) emissions calculators were used to develop 10-year projected emissions inventories for CARMMS modeling (ongoing) and also develop updated greenhouse gas (GHG) emissions inventory projections for each Field Office/Planning Area (including the Roan Plateau Planning Area) (BLM 2015b). In addition, the U.S. Environmental Protection Agency's (EPA's) Greenhouse Gas Reporting Program released its third year of emissions data in the fall of 2013. These new data and analyses are evaluated in this Proposed RMPA/FSEIS.
- Special Status Plant Species. Changes in special status plant designations have occurred since the completion of the Roan FEIS. Two species, DeBeque phacelia (*Phacelia submutica*) and Parachute penstemon (*Penstemon debilis*), were candidate species for Federal listing during the original analysis. Both of these species were listed as threatened by the U.S. Fish and Wildlife Service (USFWS) in 2011 (USFWS 2011b), and critical habitat for each species was designated by the USFWS in 2012 (USFWS 2012b).
- Special Status Wildlife Species. Colorado Parks and Wildlife (CPW), formerly named Colorado Division of Wildlife (CDOW), mapped the top of the Roan Plateau as general habitat for the greater sage-grouse (*Centrocercus urophasianus*), a BLM Sensitive Species, and a small portion as priority habitat. The BLM released the Proposed Northwest Colorado Greater Sage-Grouse Land Use Plan Amendment (LUPA) and EIS (NWCOSG FEIS) (BLM 2015d), as well as the Approved RMPA/ROD for this process (BLM 2015e). Data and management actions from the Approved RMPA/ROD are incorporated into this Proposed RMPA/FSEIS, as appropriate.
- Special Status Fish Species. Recent genetics and morphological studies have led researchers to conclude that Colorado River cutthroat trout (CRCT) in Roan Plateau streams are not indigenous to the mainstem Colorado River drainage (Green Lineage) but to the White and Yampa River drainages (Blue Lineage). In light of the new genetic and meristic research on CRCT in Colorado, as well as the need to update information for the SEIS, the BLM reevaluated CRCT populations and their habitats on the Roan Plateau.
- Oil and Gas Leasing. Since the publication of the Roan FEIS, there has been technological development related to most oil and gas activities. Changes specifically affecting the Planning Area include developments in hydraulic fracturing, directional drilling practices, multi-well pads, and the understanding of microseismicity. Current practices for oil and gas development activities are summarized in Appendix B and discussed in Section 3.5.5. Changes in development practices and natural gas prices have changed the Reasonable Foreseeable Development (RFD) Scenario for the Planning Area (Appendix G).
- Demographic and Economic Changes in the Planning Area. Since publication of the Roan FEIS, there have been substantial changes in several industries and markets affecting social and economic conditions in the Planning Area. There have also been substantial changes in oil and gas development and well drilling conditions.

## CHAPTER 1 • PURPOSE AND NEED

- Wilderness Characteristics. In 2013, BLM reviewed and updated the 2000 inventory for the Planning Area to ensure compliance with the new Manual 6310: Conducting Wilderness Characteristics Inventory on BLM Lands. The information contained in the wilderness characteristics inventory has been considered in the development and analysis of alternatives (BLM 2013c).
- Land health assessments were conducted in the Planning Area in 2013 (BLM 2013a). The results of these assessments are integrated into this Proposed RMPA/FSEIS.
- Soils. Information on soils within the Planning Area was updated in 2013 by the Natural Resources Conservation Service (NRCS) (NRCS 2013).
- Water resource information was updated to incorporate data from the Roan Cliffs Land Health Assessment (BLM 2013a).

### 1.3.7.2 Regulatory Changes

This Proposed RMPA/FSEIS integrates changes in regulations for water quality and wildlife management. The State of Colorado has changed some regulations and standards regarding surface water quality as shown below, and these new parameters are incorporated into the Proposed RMPA/FSEIS, described in more detail in Section 3.2.4. Improved exploration and production practices, summarized in Appendix B, have changed the way groundwater information is presented and analyzed, warranting a change in analysis to incorporate new information related to the potential effects of hydraulic fracturing.

- Colorado Oil and Gas Conservation Commission (COGCC) issued a notice to operators for pit design, construction, and monitoring requirements within 0.75 mile of the rim (COGCC 2008b).
- On September 30, 2013, the Water Quality Control Commission found two segments of Northwater and Trapper creeks to be “critical spawning sites” for the CRCT and these segments were designated as “outstanding” (CDPHE 2013, amended 2015).
- A Source Water Protection Area for the Town of Parachute was designated by the Source Water Protection Conservation Reserve Program (SWPCRP) and the Steering Committee as a Drinking Water Supply Protection Area (DWSPA) (Hill 2013).
- State of Colorado’s 303(d) List of Impaired Waters and Monitoring and Evaluation List (CDPHE 2012d) and stream segments with classifications and numeric standards were updated (State of Colorado Regulations 37 and 41 [CDPHE 2013, 2012b] and 305b Report [CDPHE 2012e]).

### 1.3.7.3 Management Actions Implemented Between the RODs and the Judicial Order

A number of land management actions authorized by the Roan Planning Area RMPA RODs (BLM 2007a, 2008b) were implemented prior to issuance of the Judicial Order. These include management for fluid mineral oil and gas leasing, specifically the sale of 31 oil and gas leases with commensurate collection of bids and rental payments. Transportation and travel management actions have been implemented in compliance with specific management actions in the 2007 ROD. Livestock grazing management changes have been implemented.

As a result of the Judicial Order, specific management actions that have been implemented are now subject to reconsideration in the RMPA/SEIS. If BLM’s decisions following the RMPA/SEIS process are different from those in the 2007 and 2008 RODs, BLM may need to undertake additional measures to “bring into conformance” its previous implementation actions so as to conform with the new planning decisions.

Although some decisions in the 2007 and 2008 RODs already have been implemented, the No Action Alternative described and analyzed in the Roan FEIS is brought forward as the No Action Alternative in this SEIS to remain consistent with the structure of the original document. This alternative represents a management scenario where already-implemented management actions would be assessed as if they had not been accomplished. This allows for analyzing and comparing the environmental consequences of not conducting these actions to potential alternative decisions comprising the action alternatives.

Finally, environmental hazards at the Anvil Points Facility, as discussed in the Roan FEIS, were removed and remediated after issuance of the 2007 and 2008 RODs. This Removal Action was conducted under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). All removal, restoration, and reclamation activities associated with the Anvil Points Facility clean-up were noted to be exempt from the Proposed Plan in the Roan FEIS and RODs. Because this Removal Action was conducted under the supplemental authority of CERCLA, and the ROD specifically did not address the removal activities, the action is not addressed in the SEIS.

### 1.4 PLANNING AREA

The Planning Area contains 73,800 acres of Federal land mostly in Garfield County, Colorado, and 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 73,800 acres of public land within the Planning Area is within the 116,350 acres managed by the CRVFO. This total includes 66,780 acres with BLM surface and minerals and an additional 7,020 acres with private surface but Federal minerals. An additional 4,730 acres of BLM surface and mineral estate is managed by the White River Field Office (WRFO).

The Planning Area includes both public and private lands, although the RMPA would guide only BLM efforts on the public lands that it administers. “Public lands” in this context include lands with a split estate (i.e., 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 (73,800 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.

The relationship between the Planning Area and the entire area managed by the CRVFO is shown in the insert on Figure 1-2. The total area managed by the CRVFO includes approximately 116,350 acres. The WRFO manages approximately 4,730 acres in the Planning Area.

Figure 1-3 shows the location of the line used to differentiate areas referred to throughout this RMPA/SEIS 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 their decision-making processes. BLM is the lead agency (as defined in NEPA), responsible for preparing an SEIS 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 Proposed RMPA/FSEIS to make an informed selection of

resource management options and amend the existing RMPs. The RMPAs and their ultimate implementation are the sole responsibility of BLM. However, other agencies have authority under other laws, and/or have special expertise or knowledge that is required for complete analysis of the alternatives. BLM will consult with the USFWS under Section 7 of the ESA regarding potential adverse effects of the Proposed Plan to threatened or endangered species or their critical habitat. BLM has entered into Cooperating Agency agreements with the EPA, USFWS, Garfield County, Rio Blanco County, Mesa County, the City of Rifle, the Town of Parachute, and the CPW for this RMPA/SEIS process.

### 1.6 BLM LAND USE PLANNING PROCESS

The 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. The 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 planning regulations that implement the FLPMA are found in 43 CFR 1600. These regulations outline the interdisciplinary, cooperative approach that BLM must take in preparing and maintaining 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 scoping 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). The BLM conducted internal scoping during the SEIS process to identify new information pertinent to the analysis. Scoping issues addressed include original scoping and new SEIS scoping, along with new content that has been added in response to new issues. This information is included in the ANI (BLM 2014c).
- **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. New planning criteria include addressing the Judicial Order, greater sage-grouse habitat and conservation, water quality regulatory changes and designations, and BLM air quality modeling efforts. An additional criterion was to use as much of the information in the Roan FEIS as possible in the SEIS.
- **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 conditions and capabilities, and opportunities. The AMS for the Planning Area was published in August 2002 (BLM 2002a). As part of the ANI process, the BLM reviewed the AMS to identify new conditions and information.
- **Formulate Alternatives** – The BLM planning team reviewed the issues raised during scoping for the RMPA/SEIS with the public, other agencies, and within BLM. Based on the AMS, Judicial Order, planning criteria, goals and objectives of the RMPA, and the Settlement Agreement, four alternatives were formulated for detailed analysis in the SEIS. Alternatives include: Alternative I, No Action

## CHAPTER 1 • PURPOSE AND NEED

Alternative; Alternative II, Roan FEIS Proposed Plan; Alternative III, Community Alternative; and Alternative IV, Settlement Alternative. These alternatives describe a reasonable range of management options to assist decision-makers and the public in understanding the positive and negative effects of potential future actions in the Planning Area. Five alternatives were analyzed during the Roan FEIS process, ranging from no action to a most environmentally sensitive alternative. The eight alternatives analyzed during the combined Roan FEIS and SEIS processes represent a full range of alternatives considered by BLM (eight alternatives because No Action is not analyzed twice).

In 2014, during litigation subsequent to the Judicial Order, the BLM and other parties entered into a settlement agreement (Conservation Colorado Education Fund et al. v. Sally Jewell, Bill Barrett Corporation, and Oxy USA Inc. et al. 2014), hereafter referred to as the Settlement Agreement. In the Settlement Agreement, BLM agreed to consider an alternative that included closing certain lands on top of the plateau to new oil and gas leasing while keeping other lands in the Planning Area open for leasing, exploration, and development subject to certain conditions. This combination of management decisions is analyzed as the “Settlement Alternative” in this Proposed RMPA/FSEIS. As part of the Settlement Agreement, BLM cancelled 17 leases held by Bill Barrett Corporation (BBC). BLM prepared an environmental assessment for the proposed cancellation (BLM 2015a), and after the leases were cancelled, the lessees were reimbursed rent and bonus bids paid for the leases. Environmental impacts of this action were disclosed in an Environmental Assessment (EA): Cancellation of 17 Federal Oil and Gas Leases in the Roan Plateau Planning Area, Garfield County, Colorado (BLM 2015a).

- **Estimate Effects** – Each of the four alternatives analyzed in detail in the Proposed RMPA/FSEIS have been evaluated for potential environmental consequences. The analysis addresses short-term (temporary) and long-term (more or less permanent), 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 cumulatively to past, present, or reasonably anticipated future impacts.
- **Select the Preferred Alternative and Conduct Public Review** – BLM planning regulations require that a preferred alternative be identified in both the Draft RMPA/SEIS and the Proposed RMPA/FSEIS. However, the ultimate selection of the approved RMPA in the ROD could be different from any of the four alternatives analyzed here, instead including some elements from two or more of the analyzed alternatives to reflect further analysis and public and other agency input. BLM provided a 90-day public comment period following the publication of the Draft RMPA/SEIS. The public comments and other input was considered in the Proposed Plan is evaluated, described, and published in the Proposed RMPA/FSEIS (Appendix L).

Following publication of the Proposed RMPA/FSEIS, a 30-day protest period is initiated in which any person who participated in the planning process and has an interest which is or may be adversely affected by the approval or amendment of a Resource Management Plan may protest such approval or amendment. Protests will be resolved by the BLM Director.

- **Prepare the Record of Decision (ROD)** – BLM’s Colorado State Director will issue a decision documenting the completion of the environmental review and adoption of the RMPA. The ROD will be signed after the conclusion of the governor’s consistency review, a 30-day protest period, and resolution of any protests that follow publication of the Proposed RMPA/FSEIS.
- **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 are not being met, the RMPA may be further amended or revised within the constraints of valid existing rights.

## 1.7 SUMMARY OF SCOPING ISSUES

### 1.7.1 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.

#### 1.7.1.1 Original RMPA/EIS

BLM initiated formal scoping for the 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 Native American tribe, 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 scoping 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 the 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 RMPA. As discussed in Chapter 2, the issues identified during the scoping process were taken into consideration during alternative formulation.

#### 1.7.1.2 RMPA/SEIS

An NOI to prepare a SEIS associated with the development of the RMPA for the Planning Area was issued by the BLM on January 28, 2013. This notice stated that the RMPA would amend two RMPs: the CRVFO RMP and the WRFO RMP. The NOI identified the need for the RMPA/SEIS and provided information about the Planning Area and the future planning process, preliminary planning issues and criteria in the resource area, and contact information. The NOI also initiated a 90-day scoping period, which closed on March 30, 2013. The BLM held two scoping meetings to answer questions from attendees and to collect written comments regarding the RMPA/SEIS. The BLM’s internal scoping was documented in the ANI that summarizes new information and regulations that could affect the SEIS analysis. The ANI describes, by resource, the current state of the resources, new information and the significance of the information, and changes in Federal or state regulations. The ANI is included as Appendix A to the Public Scoping Summary Report (BLM 2014a).

### 1.7.2 Planning Issues Considered

Table 1.1 summarizes issues raised by interested parties and agency staff during both scoping processes, including those considered in the RMPA/EIS and this Proposed RMPA/FSEIS, and those eliminated from further consideration. Table 1.1 also lists the planning criteria used in developing the Draft RMPA/EIS, 2006 Proposed Plan/Final EIS, and Proposed RMPA/FSEIS. These issues were considered in formulating the alternatives and the evaluation of those alternatives, as well as in developing a Preferred Alternative. Table 1.2 summarizes BLM’s planning criteria as applied to the process.

**CHAPTER 1 • PURPOSE AND NEED**

**Table 1.1 Planning Issues Raised by Interested Parties and BLM Staff during Scoping**

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

**Table 1.2 Planning Criteria Used by BLM in Developing and Implementing the RMPA/SEIS**

<p><b>Area of Analysis</b></p>	<p>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 73,800 acres of Federal lands.</p>
<p><b>Decisions to be Made</b></p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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 ESA as Threatened or Endangered (see August 30, 2000, Interagency MOA for Programmatic ESA Section 7 Consultation).</li> <li>• 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.</li> <li>• Designate special management areas, as appropriate, potentially including ACECs.</li> <li>• Establish management prescriptions for those areas BLM has determined to contain wilderness characteristics and propose to manage those lands to protect these wilderness characteristics.</li> <li>• Provide management direction to maintain, enhance, or restore physical function and biological health and achieve Land Health Standards at the watershed scale, consistent with the Standards for Public Land Health and Guidelines for Livestock Grazing Management in Colorado.</li> </ul>
<p><b>Process Criteria of Note</b></p>	<ul style="list-style-type: none"> <li>• Comply with all applicable laws, regulations, manuals, handbooks, and policies, including, but not limited to, the FLPMA; Transfer Act; Mineral Leasing Act of 1920 as amended; FOOGLRA; ESA, Bald and Golden Eagle Protection Act; MBTA; CWA; CAA; and other laws.</li> <li>• 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 Planning Area.</li> <li>• 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.</li> <li>• Recognize valid existing rights.</li> <li>• Use appropriate geographic scales (potentially larger or smaller than the Planning Area) to analyze the results of various alternatives for specific resources and to address complex issues.</li> <li>• A travel management plan is not intended to provide evidence bearing on or addressing the validity of any Revised Statute (R.S.) 2477 assertions. R.S. 2477 rights are determined through a process that is entirely independent of the BLM's planning process. Consequently, travel management planning should not take into consideration R.S. 2477 assertions or evidence. Travel management planning should be founded on an independently determined purpose and need that is based on resource uses and associated access to public lands and waters. At such time as a decision is made on R.S. 2477 assertions, the BLM will adjust its travel routes accordingly.</li> </ul>

## 1.8 CHANGES FROM DRAFT RMPA/SEIS

Changes to the Proposed RMPA/FSEIS were made in response to comments on the Draft RMPA/SEIS made by the public and Cooperating Agencies, Section 7 consultation with the USFWS, and extensive internal BLM reviews of the Draft RMPA/SEIS and the Proposed RMPA/FSEIS. In addition, editorial changes were made to improve clarity, and technical changes were made to correct errors throughout development of the Proposed RMPA/FSEIS. Information on resources or resource use was updated. New program policies and State of Colorado regulations were recognized.

Please note that substantive changes or additions of text are designated throughout the Proposed RMPA/FSEIS document and appendices as underlined text. Revised tables and figures are noted as such in their titles (i.e., Table 2.1 [Revised]). Columns added to revised tables are so indicated by underlining the column heading.

Substantive changes to the Proposed RMPA/FSEIS document are summarized by resource, below.

### 1.8.1 Climate and Air Quality

- The National Ambient Air Quality Standard (NAAQS) for ozone was changed from 75 parts per billion (ppb) to 70 ppb and was signed on October 1, 2015. Notes regarding this change in the Errata Sheet to the Roan Plateau Draft RMPA/SEIS are now incorporated into the Proposed RMPA/FSEIS. These changes are located in Section 3.2.2 and Table 3.2.1, as well as Section 4.2.5.4.1, Section 4.2.5.4.3, Section 4.2.5.4.4, and Table 4.2.15.
- Modified Table 4.2.17 to add cumulative ozone values corresponding to maximum contribution from CRVFO (Roan Planning Area). Added text to explain 2021 ozone design values.
- Added text to explain how the absolute and relative ozone analysis methods are used to assess planning area impacts to total ozone model results.
- Added cumulative deposition to the modeled Air Quality Related Value (AQRV) high, medium, and low tables from CARMMS in report (Tables 4.2.20a, 4.2.20b, and 4.2.20c).
- Added text to explain the use of surrogate modeling results for particulate matter less than 10 microns (PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), and carbon monoxide (CO).
- Updated applicable State air quality regulations: Colorado Department of Public Health and Environment (CDPHE) Regulations 3, 6, and 7.

### 1.8.2 Special Status Plant Species

- For consistency with Section 7 consultation, included discussion of DeBeque phacelia (*Phacelia submutica*) and Ute ladies'-tresses (*Spiranthes diluvialis*) in Section 3.3.3.2.
- Clarified application of GS-NSO-Roan-24: Threatened, Endangered, or Candidate Species Habitat under Alternative IV in Appendix C, page C4-1.

The NSO for Threatened, Endangered, or Candidate species habitat, as mapped and used in the impact analysis in this Proposed RMPA/FSEIS, has not been applied to designated Critical Habitat for Parachute penstemon on BLM surface, or Federal minerals available for leasing, within the Planning Area. The Settlement Agreement, which is the basis of the oil and gas leasing and development components of the Proposed RMPA, includes the condition that the alternative's management be consistent with the terms of the 2008 Base and Retained leases, including the attached stipulations. This Critical Habitat was designated after those leases were issued in 2008, and thus is not a component of the stipulations. BLM would fulfill its Section 7 consultation obligations in accordance with the ESA and through application of GS-LN-Roan-34 and GS-CSU-Roan-12, including Parachute penstemon.

### 1.8.3 Special Status Fish and Wildlife

- For consistency with Section 7 consultation, included discussion of western yellow-billed cuckoo in Section 3.3.4.2.

#### 1.8.4 Visual Resources

- Updated the potential number of oil and gas well pads visible in I-70 and Rim Road viewsheds, under all alternatives in Section 4.4.1.1, as well as Tables 4.4.1 and 4.4.2.

#### 1.8.5 Transportation

- Updated the impact analysis to reflect assumed average number of wells/year from CARRMS models in Section 4.4.4.1 and Table 4.4.34.

#### 1.8.6 Travel Management

- Updated the number of miles of designated routes open to motorized and mechanical use for all alternatives in Chapter 2. This update was integrated into the impact analysis for all alternatives in Chapter 4.

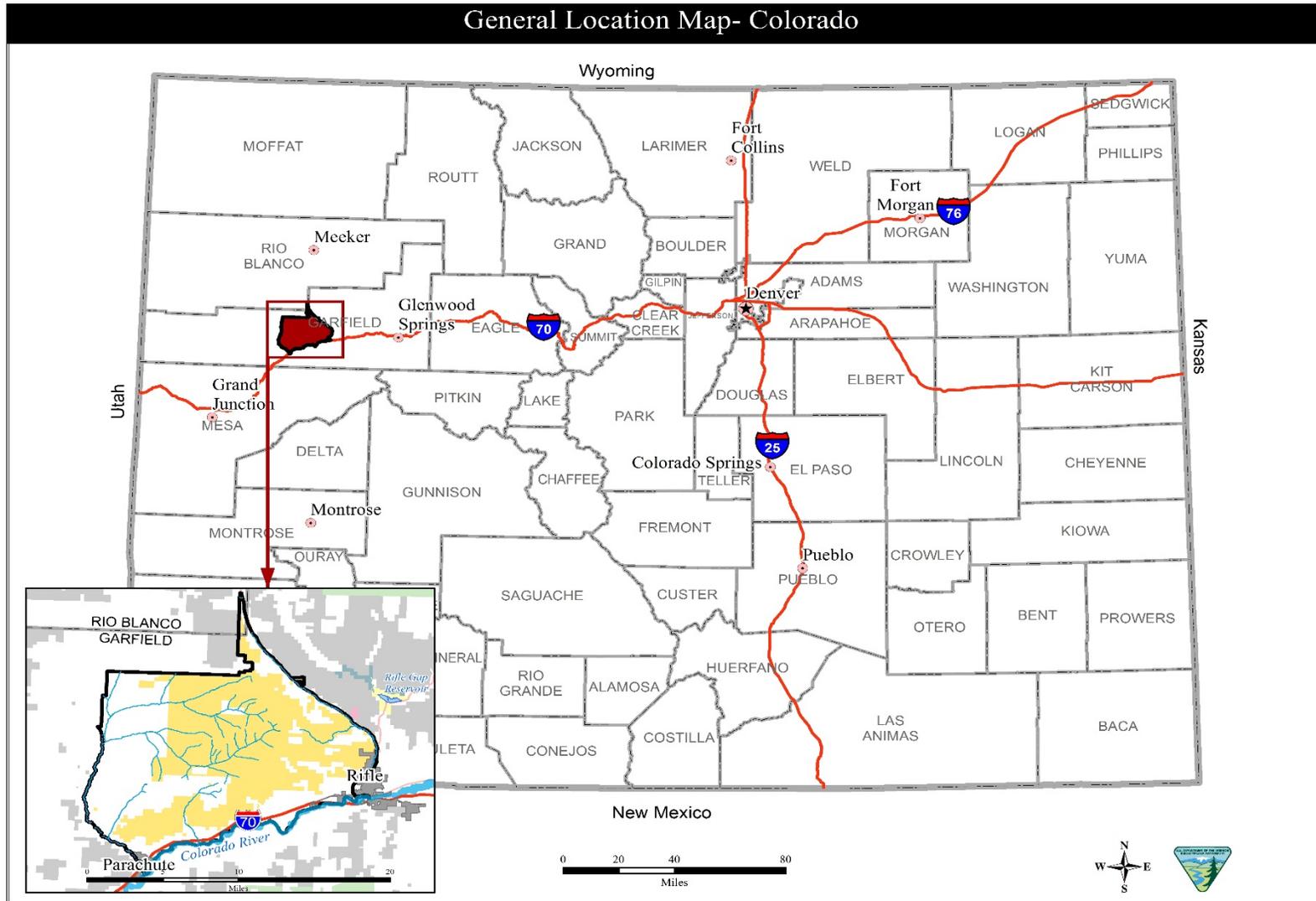
#### 1.8.7 Recreation

- Table 2.1: Considered additional firearm restrictions in management actions for Alternatives III A and III B as a result of public comment input.
  - Alternative IIIA has specifically applied firearm use restrictions to address one of the more pressing recreation/urban interface issues near the Town of Rifle, Colorado.
  - Alternative IIIB would apply firearm use restrictions to the entire Hubbard Mesa Open OHV Area.
- Integrated clarifications into Chapter 3, Sections 3.5.3.3 and 3.5.3.6, and Chapter 4, Sections 4.5.3.2, 4.5.3.3, 4.5.3.4, and 4.5.3.5.

#### 1.8.8 Lands with Wilderness Characteristics

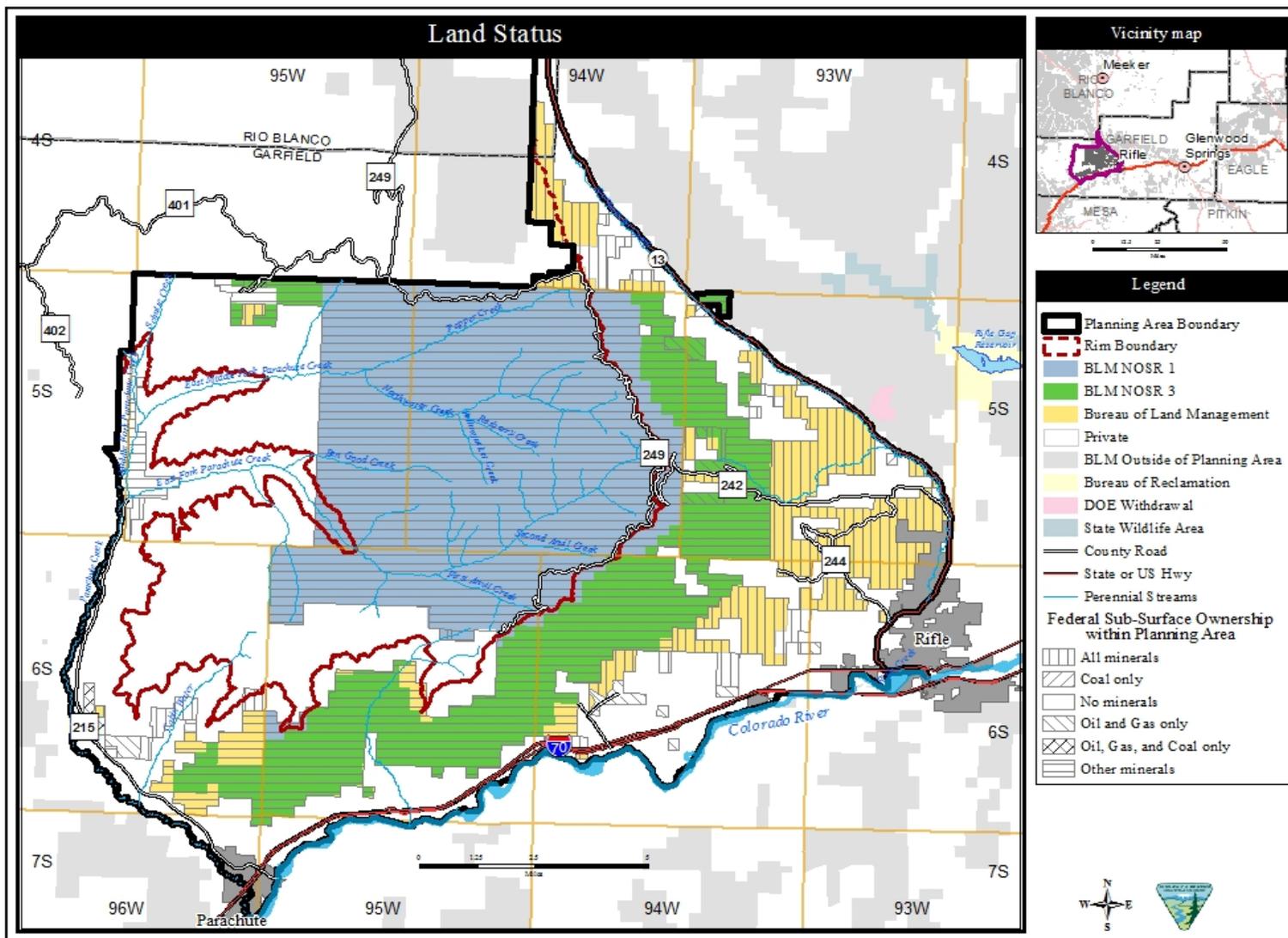
- Integrated results of the updated inventory of the Southeast Cliffs unit into Section 3.5.8.2 and revised the analysis in Section 4.5.8.3.
- Clarified that over snow travel would not be authorized above the rim under Alternative III, within the lands with wilderness characteristics. Updated Chapter 2, Table 2.1 and Section 2.3.3. Integrated this clarification in impact analysis for water resources (Section 4.2.4.4), wildlife (Section 4.3.2.4), special status plant species (Section 4.3.3.4), special status wildlife (Section 4.3.4.4), and vegetation (Section 4.3.1.4).

**Figure 1-1**  
**General Location Map**  
**Roan Plateau Proposed RMPA/FSEIS**



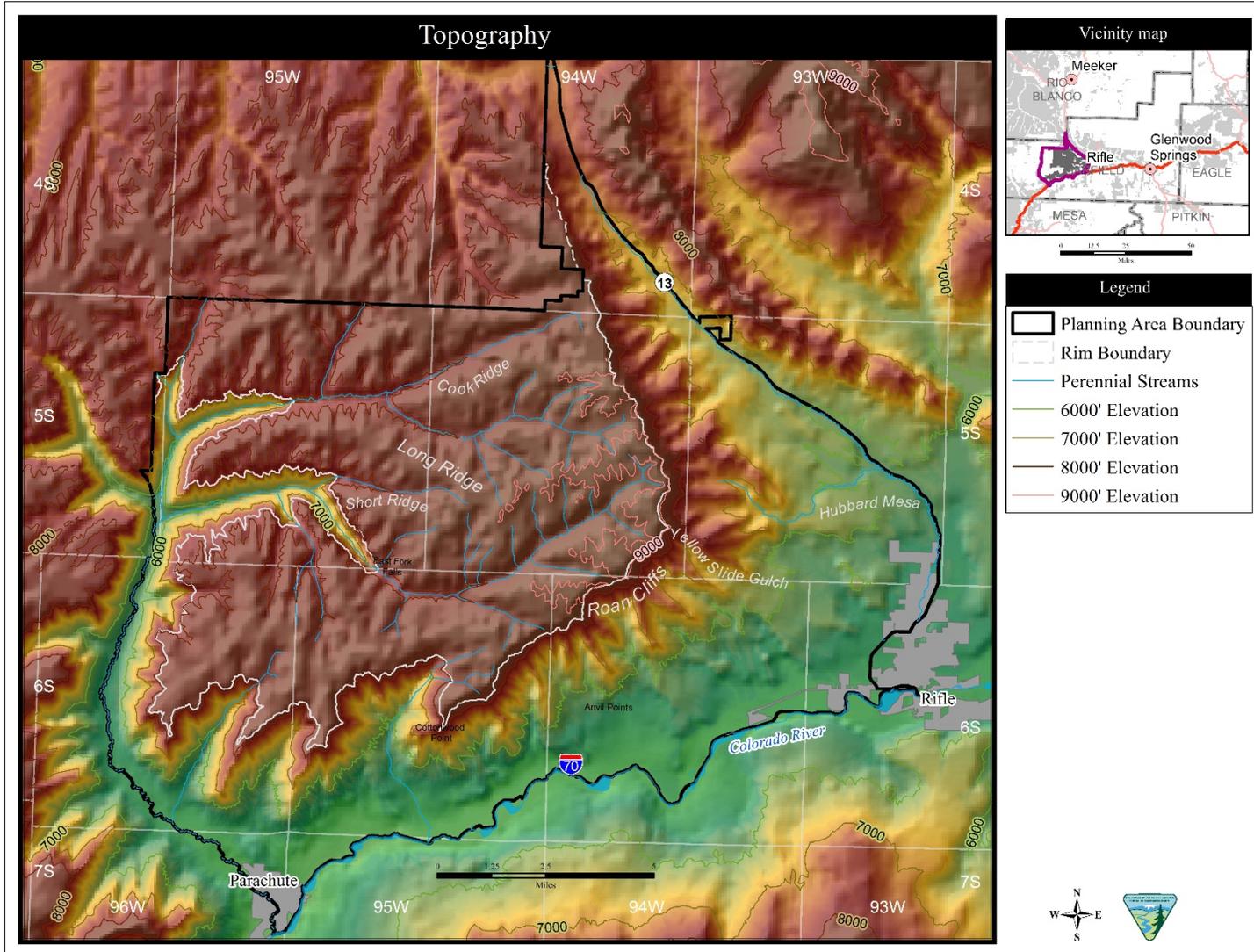
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**Figure 1-2**  
**Land Status**  
**Roan Plateau Proposed RMPA/FSEIS**



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**Figure 1-3**  
**General Planning Area View with Topography**  
**Roan Plateau Proposed RMPA/FSEIS**



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