

## **6 CONSULTATION AND COORDINATION**

### **6.1 INTRODUCTION**

This chapter presents a description and history of the public outreach and participation opportunities made available through development of the Proposed Resource Management Plan Amendment (Proposed RMPA) and Final Supplemental Environmental Impact Statement (FSEIS), and describes the consultation and coordination efforts with tribes, government agencies, and other stakeholders that have occurred to date. It also includes a list of the agencies, organizations, and individuals who have prepared this Proposed RMPA/FSEIS.

### **6.2 PUBLIC COLLABORATION AND OUTREACH**

#### **6.2.1 Notice of Intent**

The Notice of Intent (NOI) is the legal document notifying the public of the BLM's intent to initiate the planning process and, in this case, to prepare an SEIS for a major federal action. The NOI invites the participation of the affected and interested agencies, organizations, and members of the public in determining the scope and significant issues to be addressed in the planning alternatives and analyzed in the SEIS.

An NOI to prepare an SEIS associated with the development of the RMPA for the Planning Area was issued by the Department of the Interior (DOI) on January 28, 2013. This NOI stated that the RMPA will amend two Bureau of Land Management (BLM) RMPs: the Glenwood Springs Field Office (GSFO) [now the Colorado River Valley Field Office (CRVFO)] RMP and the White River Field Office (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 March 30, 2013. The BLM received close to 24,000 comment submissions during the scoping period.

#### **6.2.2 Scoping Process**

Scoping is the term used in the Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) (40 CFR, Part 1500 et seq.) to define the early and open process for determining the scope of issues to be addressed in the planning process. The scoping process provides an avenue to involve the public in identifying significant issues related to potential land use management actions. The process also helps identify any issues that are not significant and can thereby be eliminated from detailed analysis.

#### **6.2.3 Scoping Open Houses**

A press release was published by the BLM on January 25, 2013, announcing the inception of the scoping process. The BLM then held two public scoping meetings to answer questions from attendees and to collect written comments regarding the RMPA/SEIS. This notice included scoping meeting locations, times, and other mechanisms for submission of scoping comments. This information was subsequently published in the Denver Post, Grand Junction Daily Sentinel, and Glenwood Springs Post-Independent.

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During the week of February 25, 2013, open houses were held in two locations:

- February 27, 2013, 4:00 p.m. to 7:00 p.m., Colorado River Valley Field Office, 2300 River Frontage Road, Silt, Colorado; and
- February 28, 2013, 4:00 p.m. to 7:00 p.m., Clarion Inn, 755 Horizon Drive, Grand Junction, Colorado.

Attendees at each meeting were recorded via a sign-in sheet. Written scoping comments were collected at the scoping meetings and were received through the end of the scoping period via email, fax, or mail:

- Email: [roanplateau@blm.gov](mailto:roanplateau@blm.gov)
- Fax: (970) 876-9090
- Mail: Bureau of Land Management, Colorado River Valley Field Office, Roan Plateau Comments, 2300 River Frontage Road, Silt, Colorado, 81652

At this scoping phase of the planning process, an open house format was chosen over the more formal public meeting format to encourage broader participation, allow attendees to learn about the project at their own pace, and enable them to ask questions of BLM representatives in an informal one-on-one setting. A packet of fact sheets and handouts about the project and a map of the Planning Area were provided, as was a list of the anticipated planning issues and preliminary planning criteria related to the project. Site and resource maps were displayed illustrating the current situation and management techniques practiced among different resources. In addition to BLM representatives, a total of 177 people attended the two open house meetings. Scoping comments are summarized in the Scoping Report (BLM 2014c).

### 6.2.4 Project Website

The project website can be accessed at:

[http://www.blm.gov/co/st/en/BLM\\_Programs/land\\_use\\_planning/rmp/roan\\_plateau.html](http://www.blm.gov/co/st/en/BLM_Programs/land_use_planning/rmp/roan_plateau.html)

The website provides background information about the project, a public involvement timeline and calendar, maps and photos of the Planning Area, and copies of public information documents such as the NOI and Scoping Report. The site also provides a link to the comment form for submitting comments about the project and specifically on this Proposed RMPA/FSEIS. The BLM continuously updates the website with information, documents, and announcements.

## 6.3 CONSULTATION AND COORDINATION

The following subsections document the BLM's consultation and coordination efforts during the preparation of this Proposed RMPA/FSEIS. Consultation is an ongoing effort throughout the entire process of developing the approved RMPA/ROD.

### 6.3.1 Cooperating Agencies

A cooperating agency is any Federal, State, or local government agency or Native American tribe that enters into a formal agreement with the lead Federal agency to help develop an environmental analysis. More specifically, cooperating agencies “work with the BLM, sharing knowledge and resources, to

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achieve desired outcomes for public lands and communities within statutory and regulatory frameworks” (BLM *Land Use Planning Handbook* H-1601-1).

In June 2013, BLM mailed letters to Federal, State, and local representatives inviting them to participate as cooperating agencies for the Roan Plateau RMPAA/SEIS. Table 6.1 lists the agencies invited to be cooperators in the Roan Plateau RMPAA/SEIS, and Table 6.2 lists the agencies that accepted this offer and have entered into a Memorandum of Understanding (MOU) with the BLM for this purpose. The primary role of cooperating agencies is to provide input during the SEIS process on issues for which they have a special expertise or jurisdiction. The representatives meet with the lead agency periodically throughout the SEIS process to discuss issues as a group. Cooperating agencies are expected to participate in the SEIS process at the earliest possible time, including during scoping, and are available to enhance the interdisciplinary capability of the lead agency by providing needed information throughout the NEPA process.

**Table 6.1 Agencies Invited to be Cooperators**

<b>Federal Agencies</b>
Environmental Protection Agency
U.S. Fish and Wildlife Service
<b>State Agencies</b>
Colorado Parks and Wildlife
Colorado Department of Natural Resources
<b>Local Agencies</b>
Garfield County
Mesa County
Rio Blanco County
Town of Parachute
Town of Silt
City of Rifle

**Table 6.2 Cooperating Agencies**

<b>Federal Agencies</b>
Environmental Protection Agency
U.S. Fish and Wildlife Service
<b>State Agencies</b>
Colorado Parks and Wildlife
<b>Local Agencies</b>
Garfield County
Mesa County
Rio Blanco County
Town of Parachute
City of Rifle

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A meeting was held with the potential cooperating agencies on July 17, 2013, although no substantive scoping was conducted at this meeting.

MOUs were made and entered into between the CRVFO and the entities who accepted the invitation to participate as cooperating agencies for the CRVFO and WRFO RMPA revisions. The MOUs set forth the roles and responsibilities for cooperating agencies for collaborative planning and production of an SEIS for the RMPA. These agencies agreed to “work with the BLM, sharing knowledge and resources, to achieve desired outcomes for BLM lands and communities within statutory and regulatory frameworks” (BLM 2005a). Table 6.3 summarizes cooperative agency meetings, including the previous joint CRVFO/WRFO RMPA/SEIS meetings.

**Table 6.3 Cooperating Agency Meeting Dates**

July 17, 2013
August 12, 2014
October 24, 2014
November 18, 2014
January 16, 2015
June 16, 2015
August 12, 2015
June 14, 2016

The six cooperating agency meetings conducted at the CRVFO and the Garfield County Administrative Building between July 2013 and June 2015 focused on the SEIS process and issues, Settlement Agreement, socioeconomics, and alternatives. The latter two meetings addressed the Draft RMPA/SEIS and Proposed RMPA/FSEIS, respectively.

In addition to the feedback provided at these meetings, Cooperating Agencies were provided the opportunity to submit comments on specific sections (relevant to their jurisdiction or expertise) of the Administrative Draft RMPA/SEIS. Several Cooperating Agencies also submitted comments in response to the public Draft RMPA/SEIS. During this process, the Cooperating Agencies did not identify any inconsistencies with State or local plans, policies, or programs, and the BLM is not aware of any such inconsistencies.

### 6.3.2 Tribal Consultation

Native American tribes have a unique legal and political relationship with the government of the United States. Executive Order 13175 requires Federal agencies to coordinate and consult on a government-to-government basis with sovereign Native American tribal governments whose interests may be directly and substantially affected by activities on federally administered lands. Other laws, regulations, DOI guidance, and executive orders require consultation to identify the cultural values, religious beliefs, traditional practices, and legal rights of Native American people that could be affected by BLM actions on Federal lands. These include the National Historic Preservation Act of 1966 (NHPA) (as amended), the American Indian Religious Freedom Act of 1978, the Native American Graves Protection and Repatriation Act, Executive Order No. 13175 (2010), DOI Secretarial Order No. 3215 (DOI 2000), Secretarial Order No. 3317 with DOI Tribal Consultation Policy (2011), 512 Department Manual Chapter 2 (DOI 1995), BLM Manual H-8160-1 (BLM 2004), and Executive Order (EO) 13007 Indian Sacred Sites.

Consultation with Native American tribes is also part of the NEPA scoping process and a requirement of FLPMA. Tribal consultation regarding the RMPA/SEIS began on October 12, 2013 when a letter inviting scoping comments was sent to regional Native American tribes with potential interest in the RMPA/SEIS. No responses were received. Letters notifying tribes of the availability of the Draft RMPA/SEIS were sent in November, 2015. Native American tribes and organizations that were notified are listed in Table 6.4.

**Table 6.4 Notified Native American Tribes**

Ute Indian Tribe
Southern Ute Indian Tribe
Ute Mountain Ute Tribe

### 6.3.3 Special Status Species Consultation

The USFWS has been a Cooperating Agency for this planning effort and has provided input to BLM throughout the planning process, including on endangered, threatened, proposed, and candidate species, and designated Critical Habitat in the Planning Area that has been evaluated in the Proposed RMPA/FSEIS. BLM submitted a Biological Assessment (BA) based on the Proposed RMPA/FSEIS on April 11, 2016. A consultation memorandum was received from USFWS on May 19, 2016, in which the USFWS concurred with the BLM’s effects determination. Both the BA and consultation memorandum are located in Appendix M.

## 6.4 RMPA/SEIS DISTRIBUTION LIST

Visitors to the scoping open houses, as well as all scoping process commenters, were asked to specifically request to stay on the official RMPA/SEIS project mailing list to receive future notifications and mailings. In addition, the distribution list was updated throughout the development of the Draft RMPA/SEIS. The distribution list of agencies, organizations, and individuals who have been a part of the RMPA/SEIS process is available in the Project Record.

## 6.5 PUBLICATION OF THE DRAFT RMPA/SEIS

### 6.5.1 Document Release and Notice of Availability

Beginning on November 17, 2015, the entire Draft RMPA/SEIS document, including maps and appendices, was available for download from the BLM project website. BLM published the Notice of Availability (NOA) of the Draft RMPA/SEIS in the *Federal Register* on November 20, 2015 (BLM 2015). The NOA summarized BLM’s procedure for announcing public meetings during the comment period and indicated the availability of hard copies of the Draft RMPA/SEIS at the BLM Colorado River Valley Field Office. The Draft RMPA/SEIS was available for public comment for 90 calendar days. BLM requested all comments of the document be postmarked or received by the BLM Colorado River Valley Field Office, Attn: Roan Plateau SEIS, 2300 River Frontage Road, Silt, Colorado, 81652, within the comment period to be included in the comment analysis. Complete details regarding the distribution and availability of the Draft RMPA/SEIS are located in Appendix L, Public Comment Report.

### 6.5.2 Announcements and Advertisements

In addition to the NOA published in the *Federal Register*, BLM provided announcements of the NOA of the Draft RMPA/SEIS and information regarding public review and comment through a variety of other methods, including a press release, an announcement on the BLM project website, and individual communications. The press release and announcement on the BLM project website, both published on

November 17, 2015, provided advance notice of the public meetings expected to be held in January 2016, ways the dates, times, and locations of the meetings would be announced, and instructions for submitting comments on the Draft RMPA/SEIS.

Postcards announcing the release of the Draft RMPA/SEIS and the start of the public comment period were mailed to all individuals and organizations on the project mailing list on November 17, 2015. The postcards announced upcoming communications regarding the planned public meetings and summarized the ways that interested members of the public could comment on the Draft RMPA/SEIS. In addition, BLM sent emails providing the same information to 22,700 individuals and organizations on the project emailing list on November 17 and 18, 2015.

### **6.5.3 Public Meetings**

Three public meetings were held in communities near the Roan Plateau Planning Area within 60 days of the release of the Draft RMPA/SEIS. The dates, times, and locations of these meetings were announced on the project website and via press release on January 7, 2016, and are listed below.

BLM Colorado River Valley Field Office  
Silt, Colorado  
Tuesday, January 12, 2016  
4 p.m. to 7 p.m.

Grand Valley Recreation Center  
Parachute (Battlement Mesa), Colorado  
Wednesday, January 13, 2016  
4 p.m. to 7 p.m.

Rifle Branch Library  
Rifle, Colorado  
Thursday, January 14, 2016  
4 p.m. to 7 p.m.

Each meeting was held in an open house format. The NEPA process, development of the Draft RMPA/SEIS, and primary topics addressed in the Draft RMPA/SEIS were presented on posters staffed by BLM representatives and subject-matter experts who answered questions regarding the planning process and Planning Area. Fact sheets providing information on alternatives considered in the Draft RMPA/SEIS, the public comment process, management measures for recreational target shooting at Hubbard Mesa, special management designations, oil and gas development, and the project timeline were available for attendees to take. The meeting in Rifle, Colorado, followed a similar format, with BLM representatives and subject-matter experts available to answer questions regarding all the topics mentioned above. However, the focus of the meeting in Rifle, Colorado, was on shooting sports and recreation in the Hubbard Mesa Open OHV area.

At scheduled times during each meeting, BLM representatives presented major points addressed in the Draft RMPA/SEIS and answered audience questions.

Hard copy comment forms and maps were provided at each meeting, and attendees had the opportunity to provide written comments at the meetings or to take copies of the comment forms and mail written comments at a later date.

### **6.5.4 Public Comment Collection and Analysis**

Public comments received during the comment period were stored, organized, and addressed using a comment management database designed to allow consistent comment coding and response. Hard copy

comments received at the public meetings or via mail were scanned by the CRVFO and converted to electronic format before being entered into the database. Email comment submissions were converted to pdf format and entered into the database. All individual form letters were logged and counted. A single representative example of each type of form letter was entered into the database.

Each comment submission entered into the database was auto-assigned a unique identification number. Contact information provided by each unique commenter was manually entered into the database. Because the form letter comment submissions were received from thousands of commenters, individual copies of these submissions were not uploaded into the database, and contact information associated with individual form letters was not recorded. As noted, a representative example of each type of form letter was included in the database. Form letters were reviewed for individual submissions that substantially changed the original meaning of the comment, or included additional substantive comments. Any form letter meeting either criterion was considered a unique comment and entered into the database as such.

Within each comment submission, individual comments were identified and analyzed based on content. Individual substantive comments or non-substantive opinion or position statements that addressed particular topics or issues related to the planning process, Planning Area, or Draft RMPA/SEIS were identified, given a unique identification number, and coded according to a comment category. A total of 36 comment categories were designated (see Appendix L for the complete list of comment categories).

The criteria use to determine which comments were considered “substantive” or “non-substantive” is detailed in Appendix L.

Broadly, the comment categories included:

- Resource areas analyzed in the Draft RMPA/SEIS;
- Sections of the Draft RMPA/SEIS or factors considered in the NEPA analysis such as alternatives or mitigation measures; and
- The broad topics of opinion statements related to the Draft RMPA/SEIS or resource areas.

### 6.5.5 Comments by Issue Category

BLM received 50,982 comment submissions at the close of the public comment period on February 18, 2016. The vast majority of these submissions (approximately 99.9 percent) were received via email. Less than 0.10 percent were received via the U.S. Postal Service as mailed letters or as hard copy, handwritten comments submitted during the public meetings. Comment submissions are summarized in Table 6.5.

**Table 6.5 Total Public Comment Submissions, Roan Plateau Draft RMPA/SEIS**

<b>Email</b>	
Unique	80
Form letters	50,887
Total	50,967
<b>Mail</b>	
Unique	12
Form letters	-
Total	12

**Table 6.5 Total Public Comment Submissions, Roan Plateau Draft RMPA/SEIS**

<b>Hard Copy (received at public meetings)</b>	
Unique	3
Form letters	-
Total	3
<b>Total Comment Submissions</b>	<b>50,982</b>

The largest category of comment submissions (approximately 99.8 percent) was multiple copies of four form letters received via email. An example of each form letter is included in Appendix L, Public Comment Report.

A total of 95 unique (non-form letter) comment submissions on the Draft RMPA/SEIS were received. Of these, more than half (52 comment submissions) were submissions consisting of position statements or opinions, rather than substantive comments on the alternatives, information, assumptions, or analysis in the Draft RMPA/SEIS. Non-substantive position statements or opinions tended to fall into one of six general categories related to alternatives considered in the Draft RMPA/SEIS or proposed management measures related to oil and gas development, stream segments suitable for designation as Wild and Scenic Rivers, management of lands with wilderness characteristics, or recreation in the Hubbard Mesa Open OHV Riding Area. The Public Comment Report (Appendix L) lists and summarizes these types of position statements and/or opinions and provides the numbers of each type of comment submission received.

The remaining 43 unique (non-form letter) comment submissions received provided substantive comments on the alternatives, information, assumptions, or analysis in the Draft RMPA/SEIS. A number of these submissions contained more than a single comment and, in total, 237 individual substantive comments were received during the public comment period. These comments are tallied by comment source (individual, organization, or government agency) and topic or resource area addressed in Table 6.6. The majority of comments were submitted by organizations, followed by individuals, then government agencies. The topics or resource areas most frequently commented on included shooting sports (59 comments), climate and air quality (54 comments), and oil and gas leasing and development (40 comments). All other topics/resource areas were commented on fewer than 20 times. All comments are found in the Public Comment Report (Appendix L).

**Table 6.6 Summary of Substantive Comments by Topic**

<i>Issue</i>	<i>Number of Submissions</i>			
	<i>Individuals</i>	<i>Organizations</i>	<i>Government Agency</i>	<i>Total</i>
Alternatives	1	2	1	4
Areas of Critical Environmental Concern (ACEC)	8	2	-	10
Biological Resources	2	12	-	14
Climate and Air Quality	16	29	9	54
Cultural Resources	-	-	-	-
Cumulative Impacts	-	-	-	-
Environmental Justice	-	-	-	-
Executive Summary	2	1	-	3
General	-	-	-	-
Grazing and Rangeland Management	-	-	-	-

**Table 6.6 Summary of Substantive Comments by Topic**

<i>Issue</i>	<i>Number of Submissions</i>			
	<i>Individuals</i>	<i>Organizations</i>	<i>Government Agency</i>	<i>Total</i>
Hazardous Materials	-	-	1	1
Lands and Realty	-	-	-	-
Lands with Wilderness Characteristics	8	3	-	11
Mitigation	-	-	-	-
Oil and Gas Leasing and Development	-	40	-	40
Other	-	-	-	-
Public Health and Safety	-	-	-	-
Purpose and Need	-	-	-	-
Recreation	1	2	1	4
Shooting Sports	35	15	9	59
Socioeconomics	-	1	2	3
Special Status Species	-	4	-	4
Threatened and Endangered Species	1	1	-	2
Transportation	-	2	-	2
Travel Management	1	3	-	4
Visual Resources	-	2	-	2
Water Resources	3	3	7	13
Wild and Scenic Rivers	2	5	-	7
<b>Total</b>	<b>80</b>	<b>127</b>	<b>30</b>	<b>237</b>

### 6.5.6 Comment Response

Draft comment responses were reviewed by the BLM Interdisciplinary Team (IDT), including air quality specialists, biologists and ecologists, and recreation planners. Many substantive comments concerned identical or similar issues. In these cases, collective responses were developed that note where information and analysis related to the issues raised in these comments may be found in the Proposed Plan/Final SEIS. All comment responses are included in Appendix L, Public Comment Report. [A complete report of full comment submissions, marked with individual comments and comment responses is available for review on BLM project website, which can be accessed at: \[http://www.blm.gov/co/st/en/BLM\\\_Programs/land\\\_use\\\_planning/rmp/roan\\\_plateau.html\]\(http://www.blm.gov/co/st/en/BLM\_Programs/land\_use\_planning/rmp/roan\_plateau.html\)](#)

All substantive changes to the Proposed RMPA/FSEIS from the Draft RMPA/SEIS, based on public comments, are summarized in Section 1.8.

## 6.6 LIST OF PREPARERS

An interdisciplinary team of resource specialists from the BLM and specialists from independent, third-party consulting firms prepared this Draft RMPA/SEIS (Table 6.7). Under guidance and direction from the BLM, the team prepared alternatives, collected data for the analyses, assessed potential effects from the alternatives, and prepared the other chapters of this document.

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Table 6.7 Proposed RMPA/FSEIS Preparers

<i>Name</i>	<i>Discipline</i>
<b><i>BLM, CRVFO Energy Office Interdisciplinary Team Members</i></b>	
Gregory Larson	Project Manager
Karl Mendonca	Field Manager
Peter Cowan	Petroleum Engineer
Jim Byers	Natural Resource Specialist
Sylvia Ringer	Wildlife Ecology
Faith Dziedzic	GIS Specialist
Rusty Stark	Fire and Fuels
Vanessa Caranese	Natural Resources
Kimberly Leitzinger	Outdoor Recreation
John Brogan	Archeology
Julie McGrew	Natural Resources
Judy Perkins	Botany
Tom Fresques	Fish Biology
Steve Ficklin	Program Manager
Allen B. Crockett	Project Team Leader
John Pittman	Rangeland
John Brogan	Cultural, Historic, and Native American Resources
Chad Schneckenburger	Outdoor Recreation Planner
Carmia Woolley	Physical Scientist
<b><i>Former BLM Interdisciplinary Team Members</i></b>	
Steven Bennett	CRVFO Field Manager
Vince Hooper	Project Manager
Shauna Kocman	Soil Resources
Todd Sieber	Geology, Paleontology
<b><i>BLM Colorado State Office</i></b>	
Harley Armstrong	Regional Paleontologist
Forrest Cook	Air Specialist
Carol Dawson	Botanist
Daniel Haas	Archeologist
Martin Hensley	Economist
Chad Meister	Natural Resource Specialist
Edward Rumbold	Hydrologist
Robin Sell	Wildlife Biologist
Roy Smith	Water Rights Specialist
Megan Stouffer	Branch Chief, Planning and Assessment

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Table 6.7 Proposed RMPA/FSEIS Preparers

<i>Name</i>	<i>Discipline</i>
<b>Contractor, Ecology and Environment, Inc.</b>	
Maureen O'Shea-Stone	Project Manager
Susan Serreze	Deputy Project Manager Geological Resources, Paleontological Resources, Soil Resources, Visual Resources; Oil and Gas Leasing and Development, Other Minerals
Carron Meaney	Terrestrial and Aquatic Wildlife, Special Status Fish and Wildlife
Susan Nordstrom	Upland Vegetation and Riparian/Wetland Resources, Special Status Plants and Significant Plant Communities
Bruce Wattle	Climate and Air Resources
Nick Czarnecki	Climate and Air Resources
Tracy Emanuel	Water Resources
Erin Lynch	Water Resources
Bill Richards	Special Designations
Letha Lencioni	Oil and Gas Leasing and Development
Jennifer Jackson	Grazing and Rangeland Management
Matthew Lieuallen	Public Health and Safety
Scott Severs	Project Record
Chris Jessen	Geospatial Analyst
Travis Whitney	Lands and Realty, Lands with Wilderness Characteristics, Areas of Critical Environmental Concern, Wild and Scenic Rivers
William Richards	Lands and Realty, Lands with Wilderness Characteristics, Areas of Critical Environmental Concern, Wild and Scenic Rivers
Chrissy Ringo	Technical Editor
John Sander	Technical Editor
Pat Mooney	Word Processing
Jan Brick	Document Manager, Section 508 Compliance
<b>Contractor, Lloyd Levy Consulting LLC</b>	
Lloyd Levy	Socioeconomics
<b>Contractor, Economic Insights of Colorado</b>	
Mike Retzlaff	Socioeconomics

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