

# Appendix X. Comment Analysis

## X.1. Introduction

On September 9, 2011, the Bureau of Land Management (BLM) published the Notice of Availability (NOA) in the Federal Register announcing the release of the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Lander Field Office planning area. The NOA initiated the 90-day public comment period. At the request of the public and cooperating agencies, the BLM extended the comment period by 45 days, for a total comment period of 135 days. The public comment period ended on January 20, 2012. During the public comment period, the BLM hosted three commenting workshops in September 2011 and five public meetings in October 2011 in towns and cities throughout the planning area. The commenting workshops informed readers how to navigate the Draft RMP and EIS, and how to prepare and submit substantive comments. At the October public meetings, the BLM gathered public comments on the Draft RMP and EIS, and agency representatives were available at the meetings to answer questions from the public.

During the public comment period, the BLM received 262 unique comment documents and more than 25,000 form letters. This report summarizes the full range of issues and concerns as submitted by the public during the comment period. The submitted comments and summaries presented in this report do not necessarily represent the sentiments of the public as a whole. However, this summary does attempt to provide fair representation of the wide range of views submitted during the public comment period. In consideration of these views, it is important for the public and decision makers to understand that this process does not attempt to treat input as if it were a vote. Instead, comment analysis is a process that allows the BLM to review and consider received comments, develop appropriate responses, revise the Draft RMP and EIS in response to comments, and support the BLM's decision-making process.

The remainder of this report is organized as follows:

- **Comment Analysis Process** – Describes how the BLM received, recorded, and categorized comment documents and comments.
- **Commenter Demographics** – Presents demographic information associated with submitted comment documents, including geography and affiliation of commenters.
- **Analysis of Comments** – Provides a breakdown of the number of comments received by issue category, a summary of comments received, and a summary of the BLM's response to comments received.

This report refers to two attachments which are available on the RMP project website (<http://www.blm.gov/wy/st/en/programs/Planning/rmps/lander.html>):

- **Attachment A: Commenter Index** – Includes instructions on how to use the tables in Attachment A and Attachment B. It also includes an index listing the names of all commenters and their associated comment document number.
- **Attachment B: Individual Comments and Index to Summary Comments and Summary Responses** – Includes all substantive public comments received during the public comment period along with an index to help users find their associated summary comments and response.

## X.2. Comment Analysis Process

The BLM used a systematic process to compile, categorize, and evaluate written comments from individuals, federal and state agencies, tribal governments, elected representatives, and other organizations on the Draft RMP and EIS to identify substantive issues for review and response by BLM decision-makers. The comment analysis process provides a methodical approach for the BLM to revise text in the Draft RMP and EIS based on comments provided during the public comment period. Additionally, through the comment analysis process, the BLM supplemented the project mailing list, and compiled demographic information on the geographic distribution of commenters.

Public comment documents include hardcopy comments received at the public meetings, and electronic or written comment documents postmarked within the 135-day public comment period. Methods of comment document submittal included U.S. mail, e-mail, fax, and public meetings. All individuals attending public meetings were encouraged to submit comments in writing. The entire written submission from a commenter (e.g., full letter or e-mail) is referred to as a "public comment document"; an individual and identifiable substantive expression of interest or issue statement included in a public comment document is referred to as a "comment." For example, a letter (i.e., public comment document) received within the public comment period might have included one or more separate comments. "Commenter" refers to the individual or organization who submitted the comment document.

### X.2.1. Analysis Process

The BLM comment analysis team used the software program CommentWorks®, an online comment tracking and analysis platform, to catalogue, number, review, categorize, and respond to public comments on the Draft RMP and EIS.

Upon receipt of a public comment document, a member of the comment analysis team logged the comment document into a comment tracking spreadsheet, assigned the document a unique identifier (e.g., Document 10001), and converted the comment document to a searchable electronic (i.e., PDF) document. The analysis team then added all pertinent commenter information (e.g., name, affiliation, address, and type of comment document) into CommentWorks® and uploaded the electronic documents to the system.

The first step in the analysis process was to identify individual substantive comments within a public comment document. The comment analysis team identified each substantive comment based on guidance in the BLM National Environmental Policy Act (NEPA) Handbook (H-1790-1). Substantive comments are those that do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the RMP and EIS
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis
- Present new information relevant to the analysis
- Present reasonable alternatives other than those analyzed in the RMP and EIS
- Cause changes or revisions in one or more of the alternatives

Comments not considered substantive included the following:

- Comments in favor of or against the Proposed Action or alternatives without reasoning that meet the substantive comment criteria listed above

- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the substantive criteria listed above
- Comments that do not pertain to the planning area or scope of the RMP and EIS
- Comments that take the form of vague, open-ended questions

Based on the comments respondents received and on legal guidance, the analysis team established an issue coding structure for all substantive comments within CommentWorks® and used the coding structure to bracket and sort comments into logical groups or issue categories (e.g., air quality, cumulative impacts, and cultural resources). Table X.1, “Issue Categories” (p. 1831) lists all issue categories identified for the Draft RMP and EIS.

**Table X.1. Issue Categories**

Issue Categories		
Air Resources	Invasive Species	Salable Minerals
Areas of Critical Environmental Concern	Lands and Realty	Socioeconomic
Climate Change	Laws, Regulations, Guidance, Process	Soil
Congressionally Designated Trails	Livestock Grazing Management	Special Status Species
Cultural Resources	Leasable Minerals – Geothermal	Trails and Travel Management
Cumulative Impacts	Leasable Minerals – Oil and Gas	Vegetation
Editorial, Readability, and Data Issues	Leasable Minerals – Oil Shale	Visual Resource Management
Environmental Justice	Leasable Minerals – Other Solid Leasable Minerals	Water
Extension and Hard Copy Request	Locatable Minerals	Wild and Scenic Rivers
Fire and Fuels Management	Recreation	Wild Horses
Fish	Renewable Energy	Wilderness Characteristics
Greater Sage-Grouse	Rights-of-Way and Corridors	Wilderness Study Areas
Health and Safety	Riparian-Wetland	Wildlife

The BLM Interdisciplinary Team reviewed individual comments after the comments were assigned to an issue category, and provided direction to develop a response. The comment analysis team then used the individual comments and Interdisciplinary Team direction to analyze, group, and summarize comments, and to develop responses to the summary comments.

When reviewing comments, the analysis team looked not only for each action or change requested by the public, but also for any supporting information to capture the comment and its context in its entirety. In doing so, paragraphs within a comment document might have been divided into several comments because the paragraphs contained more than one comment; conversely, multiple sections of a comment document might have been combined to form one coherent comment.

It is important to note that during the process of identifying individual comments and concerns, the BLM treated all comments equally. The BLM did not weight comments based on organizational affiliation or status of commenters, and the number of duplicate comments did not increase the priority or merit of one comment over another. The process was not one of "counting votes," and the BLM did not make any effort to tabulate the exact number of people for or against any given aspect of the Draft RMP and EIS. Rather, the BLM focused on an understanding of the content of a comment, how it related to the Draft RMP and EIS, and appropriate responses and revisions to the Draft RMP and EIS.

### X.3. Commenter Demographics

This section summarizes commenter demographics based on information provided in comment documents. Demographic analysis allows the BLM to form an overall picture of issues, and a

better understanding of who is submitting comments, the geographic distribution of commenters, their affiliations, and the format of the public comment documents.

### X.3.1. Geographic Representation

The BLM tracked the geographic representation for each comment document that included such information. Table X.2, “Number of Commenters by Geographic Location” (p. 1832) identifies the number of comment documents received from individual geographic locations (excluding form letters). Figure X.1, “Number of Comment Documents by Geography” (p. 1833) depicts the geographic distribution of comment documents received from within the planning area, from outside the planning area but within the State of Wyoming, and from outside Wyoming. The BLM received the most comment documents from commenters within the planning area.

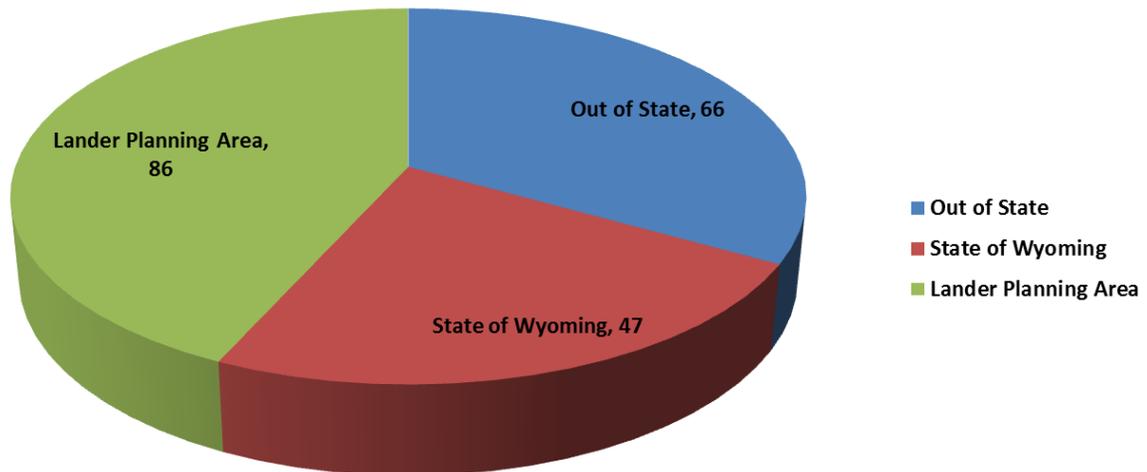
**Table X.2. Number of Commenters by Geographic Location**

State	City	Number of Commenters
Alaska	Anchorage	2
Arizona	Apache Junction	1
California	Healdsburg	1
California	Los Angeles	1
California	Oroville	1
California	Santa Rosa	1
California	Santa Ynez	1
California	West Hollywood	1
Colorado	Colorado Springs	1
Colorado	Denver	8
Colorado	Fort Collins	1
Colorado	Golden	1
Colorado	Lakewood	1
Colorado	LaSalle	1
Colorado	Loveland	1
District of Columbia	Washington	1
Florida	Miami	2
Iowa	Monticello	1
Idaho	Idaho City	1
Idaho	McCall	1
Illinois	Bartelso	1
Illinois	Chicago	1
Massachusetts	Millville	1
Massachusetts	Tewksbury	1
Maryland	Baltimore	2
Maryland	Chevy Chase	1
Maine	Fredericton	1
Missouri	Independence	2
Montana	Helena	1
Montana	Missoula	1
New Mexico	Albuquerque	3
New Mexico	Deming	1
Nevada	Las Vegas	1
New York	Canadaigua	2
Ohio	Cutler	1
Ohio	Willoughby	1
Oklahoma	Oklahoma City	1

State	City	Number of Commenters
Oregon	Klamath Falls	1
Pennsylvania	Pottstown	1
Tennessee	Knoxville	1
Texas	Austin	1
Texas	Dallas	1
Texas	Midland	1
Utah	Logan City	1
Utah	Salt Lake City	1
Virginia	Arlington	1
Washington	Cameno Island	1
Washington	Deer Park	1
Washington	Monroe	1
Wisconsin	Delafield	1
Wisconsin	Madison	1
Wisconsin	Sturgeon Bay	1
Wyoming	Alcova	1
Wyoming	Atlantic City	1
Wyoming	Bairoil	2
Wyoming	Basin	1
Wyoming	Casper	2
Wyoming	Cheyenne	13
Wyoming	Cody	4
Wyoming	Dubois	8
Wyoming	Green River	1
Wyoming	Jackson	1
Wyoming	Jeffrey City	2
Wyoming	Lander	62
Wyoming	Laramie	8
Wyoming	Moose	1
Wyoming	Moran	1
Wyoming	Pinedale	2
Wyoming	Powell	2
Wyoming	Rawlins	4
Wyoming	Reliance	1
Wyoming	Riverton	11
Wyoming	Sheridan	1
Wyoming	Shoshoni	2
Wyoming	Thermopolis	1
Wyoming	-	1
<b>Total</b>		<b>199</b>

Note: Comments received through e-mail that did not include mailing addresses or geographic representation accounted for 63 submissions.

Note: Form letters were counted once based on the geographic location of the originating entity for the master form letter.



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Note: Form letters were counted once based on the geographic location of the originating entity for the master form letter.

**Figure X.1. Number of Comment Documents by Geography**

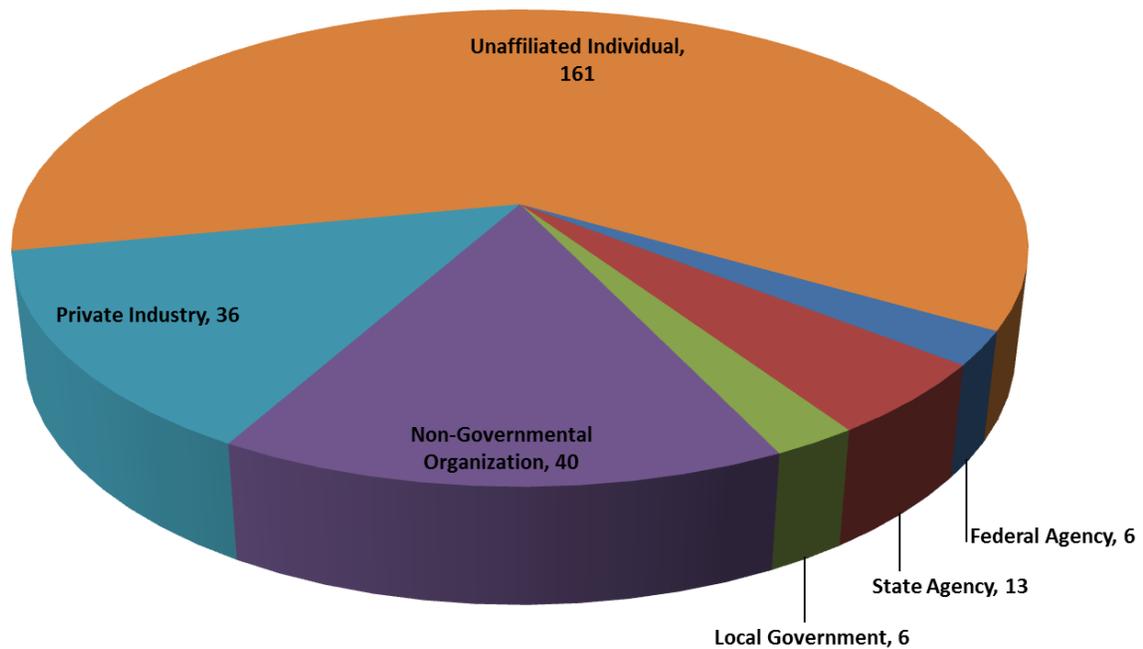
### X.3.2. Organizational Affiliation

The BLM received comments from a range of entities, as listed in Table X.3, “Number of Comment Documents by Affiliation (excluding form letters)” (p. 1834) and shown on Figure X.1, “Number of Comment Documents by Geography” (p. 1833). The BLM affiliated comment documents with a government or non-governmental organization if the comment document was received on official letterhead or was received through an official agency or organization e-mail address. The BLM classified all other comment documents as unaffiliated individuals. The BLM received the most comment documents from unaffiliated individuals.

**Table X.3. Number of Comment Documents by Affiliation (excluding form letters)**

Affiliation	Number of Public Response Documents
Federal Agency	6
State Agency	13
Local Government	6
Non-Governmental Organization	40
Private Industry	36
Unaffiliated Individual	161
<b>Total</b>	<b>262</b>

Note: Form letters were counted once based on the geographic location of the originating entity for the master form letter.



Note: Form letters were counted once based on the geographic location of the originating entity for the master form letter.

**Figure X.2. Number of Comment Documents by Affiliation**

### X.3.3. Public Comment Document Method of Delivery

The BLM received comment documents through a variety of delivery methods, as listed in Table X.4, “Number of Public Comment Documents by Method of Delivery” (p. 1835). The BLM received the most comment documents through e-mail (190) and U.S. Mail (69).

**Table X.4. Number of Public Comment Documents by Method of Delivery**

Method of Delivery	Number
E-mail	190
U.S. Mail	69
Fax	3
<b>Total</b>	<b>262</b>

### X.3.4. Form Letters

The BLM received approximately 25,000 form letters. Form letters are standardized and duplicated letters that contain the same text or portions of text and comments. The BLM reviewed the form letters and extracted and analyzed any comments unique and supplemental to the form letter; however, the BLM considered comments with the same text as one comment. The BLM designated the first form letter from each originating entity as the “master” comment document and reviewed each subsequent form letter to ensure the content was identical to the master comment document. The BLM received form letters from the Greater Yellowstone Coalition,

Sierra Club, and two unknown entities, for a total of four master comment documents. The BLM received seven form letters via U.S. mail; all other form letters arrived via e-mail. When form letters included additional text, the BLM reviewed and processed them if they contained substantive individual comments.

## X.4. Analysis of Comments

The 262 public comment documents contained substantive and non-substantive comments. Representative non-substantive comments included requests to be added to the project mailing list, requests for a copy of the Draft RMP and EIS, personal preference or opinion, unsupported comments and questions, and comments outside the scope of the Draft RMP and EIS.

In accordance with the BLM NEPA Handbook (H-1790-1), the BLM analyzed and responded to comments on the Lander Draft RMP and EIS if they were substantive and related to inadequacies or inaccuracies in the analysis or methodologies used; identified new impacts or recommended reasonable new alternatives or mitigation measures; or involved substantive disagreements on interpretations of significance. (See 40 Code of Federal Regulation 1502.19, 1503.3, 1503.4, 1506.6, and 516 DM 4.17). BLM NEPA Handbook (H-1790-1) identifies the following comment category examples and appropriate responses:

### Substantive Comments

- **Question, with a reasonable basis, the accuracy of the information in the EIS.** Factual corrections should be made in the Proposed RMP and Final EIS in response to comments that identify inaccuracies or discrepancies in factual information, data, or analysis.
- **Question, with a reasonable basis, the adequacy of environmental analysis as presented.** Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate might or might not lead to changes in the EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments might necessitate an evaluation of analytical conclusions. If, after reevaluation, the manager responsible for preparing the EIS does not think a change is warranted, the response should provide the rationale for that conclusion.
- **Identify New Impacts, Alternatives, or Mitigation Measures.** If public comments on a Draft RMP and EIS identify impacts, alternatives, or mitigation measures that were not addressed in the draft, the manager responsible for preparing the RMP and EIS should determine if they warrant further consideration. If they do, that manager must determine whether the new impacts, new alternatives, or new mitigation measures should be analyzed in either the Proposed RMP and Final EIS, a supplement to the Draft RMP and EIS, or a completely revised and recirculated Draft RMP and EIS.
- **Disagree with Significance Determinations.** Comments might directly or indirectly question determinations regarding the significance or severity of impacts. A reevaluation of these determinations could be warranted and might lead to changes in the Proposed RMP and Final EIS. If, after reevaluation, the manager responsible for preparing the EIS does not think a change is warranted, the response should provide the rationale for that conclusion.

### Non-Substantive Comments

- **Express Personal Preferences.** Comments that express personal preferences or opinions on the proposal do not require further agency action. They are summarized whenever possible and brought to the attention of the manager responsible for preparing the RMP and EIS.

Although personal preferences and opinions might influence the final selection of the agency's preferred action, they generally will not affect the analysis.

- **Other.** In addition to the five categories from the NEPA Handbook described above, the BLM added a sixth category named “other” which includes requests for copies of the Draft RMP and EIS, requests to be added to the project mailing list, and comments outside the scope of the RMP and EIS. These comments are considered non-substantive and do not require further agency action.

### X.4.1. Comment Submittals by Issue Category

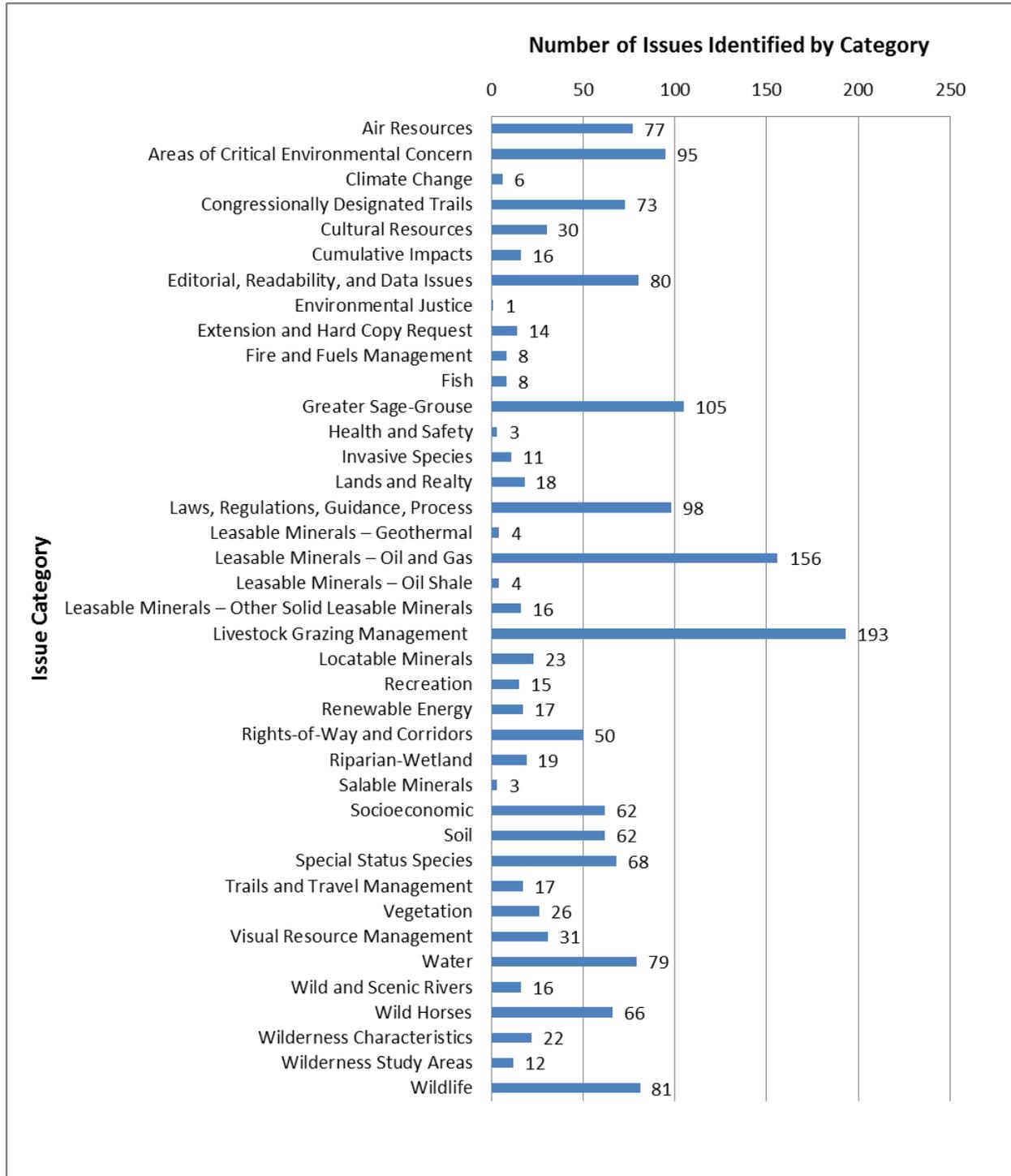
Within the 262 received comment documents, the BLM identified 1,685 individual substantive comments covering a broad range of issue categories. The greatest number of substantive comments was associated with livestock grazing management (193), oil and gas (156), and greater sage-grouse (105). Attachment A includes an index for users to identify their comment documents, and Attachment B includes all individual substantive comments and an index for users to identify the corresponding BLM summary comments and responses (available on the Lander RMP project website <http://www.blm.gov/wy/st/en/programs/Planning/rmps/lander.html>). Table X.5, “Number of Comments per Issue Category” (p. 1837) and Figure X.3, “Number of Individual Comments by Issue Category” (p. 1838) identify the number of comments submitted by issue category.

**Table X.5. Number of Comments per Issue Category**

Issue Category	Number of Comments Per Issue Category
Air Resources	77
Areas of Critical Environmental Concern	95
Climate Change	6
Congressionally Designated Trails	73
Cultural Resources	30
Cumulative Impacts	16
Editorial, Readability, and Data Issues	80
Environmental Justice	1
Extension and Hard Copy Request	14
Fire and Fuels Management	8
Fish	8
Greater Sage-Grouse	105
Health and Safety	3
Invasive Species	11
Lands and Realty	18
Laws, Regulations, Guidance, Process	98
Leasable Minerals – Geothermal	4
Leasable Minerals – Oil and Gas	156
Leasable Minerals – Oil Shale	4
Leasable Minerals – Other Solid Leasable Minerals	16
Livestock Grazing Management	193
Locatable Minerals	23
Recreation	15
Renewable Energy	17
Rights-of-Way and Corridors	50
Riparian-Wetland	19
Salable Minerals	3
Socioeconomic	62

<b>Issue Category</b>	<b>Number of Comments Per Issue Category</b>
Soil	62
Special Status Species	68
Trails and Travel Management	17
Vegetation	26
Visual Resource Management	31
Water	79
Wild and Scenic Rivers	16
Wild Horses	66
Wilderness Characteristics	22
Wilderness Study Areas	12
Wildlife	81
<b>Total</b>	<b>1,685</b>

Note: Duplicative comments in form letters were only counted once.



Note: Duplicative comments in form letters were only counted once.

**Figure X.3. Number of Individual Comments by Issue Category**

## **X.4.2. Substantive Comment Summary and Response**

To provide a user-friendly method of understanding the broad themes and topics of concern expressed in the substantive comments, the BLM grouped individual comments with similar topics and concerns and developed 63 summary comments and responses. Table X.6, “Comment and Response Summaries” (p. 1841) lists the 63 summary comments and responses generally organized by BLM resource program and other appropriate issue categories (e.g., extension and hard copy requests), as described in Table X.1, “ Issue Categories” (p. 1831). The summary numbers in Table X.6, “Comment and Response Summaries” (p. 1841) can be used to track the summary comment and response to the individual comments presented in Attachment B (available on the Lander RMP project website <http://www.blm.gov/wy/st/en/programs/Planning/rmps/lander.html>).

Table X.6. Comment and Response Summaries

Issue	Summary Number	Summary Comment	Summary Response
Air Quality	2001-1	<p>Commenters stated that there are various instances of inadequate, inaccurate, or insufficient information and/or data throughout the air quality impact analysis. Specifically, commenters asserted that use of data from only four air monitoring stations in the planning area and the limited amount of available air quality data from sources in and adjacent to the planning area provided inadequate data for use in completing an accurate analysis.</p> <p>Commenters requested the Bureau of Land Management (BLM) provide additional information, including (1) the methods and criteria used in analyzing air quality in the planning area, (2) justification of the ability of monitoring sites to adequately characterize air quality in the planning area, and (3) disclosure of the associated costs of implementing air quality mitigation.</p> <p>Additionally, commenters offered technical corrections to various statements made in the air quality analysis, requested inclusion of Class 1 areas in and adjacent to the planning area, requested data regarding uranium mining, and suggested addressing carbon dioxide (CO<sub>2</sub>) sequestration.</p>	<p>The BLM updated the air quality sections in the Proposed RMP and Final EIS, Appendix F (p. 1491), and Appendix U (p. 1651) to respond to comments, as appropriate. Updates include, but are not limited to, the following: technical data and references were corrected associated with the most recent National Emissions Inventory, National Ambient Air Quality Standards (NAAQS), and ozone exceedances, standards, and chemistry. Appendix F (p. 1491) addresses ambient air monitoring commitments in the planning area.</p> <p>Project proponents are responsible for incurring the costs associated with their proposed actions. Every management action is unique, and might or might not have requirements or mitigation measures developed to protect resources. Any such measures would be within the purview of existing rules and regulations and within the BLM's authority in accordance with the Federal Land Policy and Management Act (FLPMA). Additionally, without knowing the specifics of future management actions, the BLM cannot estimate or assign a cost to such actions.</p> <p>The BLM incorporated Class I and II areas within 40 miles of the planning area in Appendix F (p. 1491), and updated the rights-of-way (ROW) sections to include CO<sub>2</sub> sequestration management. The BLM does not have accurate data for emissions associated with uranium open-pit mining.</p>
Air Quality	2001-2	<p>Commenters questioned the authority of the BLM to regulate air quality and require air quality mitigation measures in the region, and the State of Wyoming overall. Commenters requested additional references to applicable air quality laws and policies (specifically the 2011 Memorandum of Understanding [MOU] between the Environmental Protection Agency (EPA), the U.S. Department of the Interior, and the U.S. Department of Agriculture), and that management demonstrate compliance with Wyoming Department of Environmental Quality (DEQ) regulations and other applicable regulations. Specifically, commenters requested additional text clarifying the scope of BLM's authority in regulating air quality and that the Lander</p>	<p>The BLM has air resource management obligations and responsibilities under the National Environmental Policy Act (NEPA), FLPMA, and the Clean Air Act (CAA) and cannot authorize any action that would not comply with any state or federal regulation. Specifically, FLPMA requires in Section 202 [43 United States Code (U.S.C.) 1712 (c)(8)]: <i>compliance with applicable pollution control laws, including state and Federal air, water, noise, or other pollution standards or implementation plans.</i></p> <p>The BLM is not attempting to regulate air quality or to supersede Wyoming DEQ's authority. The BLM goals and</p>

Issue	Summary Number	Summary Comment	Summary Response
		<p>RMP be consistent with conditions established in the 2011 MOU.</p> <p>Additionally, commenters requested the BLM include additional details outlining how stated goals and objectives for air quality management in the planning area will be accomplished, specifically regarding future oil and gas developments and associated impacts to air quality.</p>	<p>objectives were developed as required by the NEPA process for each resource identified in scoping, and were agreed to in a cooperating agency process that included Wyoming DEQ and EPA. The goals identified by the BLM do not interfere with Wyoming DEQ's authority and indicate that the BLM will comply with state regulations.</p> <p>The BLM believes the Proposed RMP and Final EIS are consistent with the 2011 MOU, and the BLM will continue to abide by the processes and recommendations outlined in the MOU. The decision to model a particular project or geographic area is made case by case and depends on availability of input data, geographic and meteorological conditions, current state of air quality, and proximity of sensitive air sheds or receptors.</p> <p>The BLM has authority to require Best Management Practices (BMPs), Conditions of Approval (COAs), or other measures determined in cooperation with other federal land management and regulatory agencies (including EPA and Wyoming DEQ), if management actions have the potential to adversely or substantially impact any resource area, including air resources. BMPs, mitigation measures, and COAs are project-specific and will be identified in subsequent NEPA documents addressing such projects.</p> <p>The Lander Air Management Plan in Appendix F (p. 1491) includes requirements for emissions inventories, monitoring, and modeling. Project-specific requirements will be determined during the development of an EIS and subsequent Record of Decision (ROD) for major oil and gas projects.</p>

Issue	Summary Number	Summary Comment	Summary Response
<p>Areas of Critical Environmental Concern</p>	<p>2002-1</p>	<p>Commenters questioned if the existing and newly proposed Areas of Environmental Concern (ACECs) meet the relevance and importance criteria requirements as stated in 43 Code of Federal Regulations (CFR) 1610.7-2 and the BLM Manual 1613, and whether these areas require special management to (1) protect the area and prevent irreparable damage to resources or natural systems and (2) adequately protect these areas from energy developments through the issuance of No Surface Occupancy (NSO) stipulations. In some cases, commenters suggested improvements to ACEC designations and provided detailed reasoning to support their position for modifications. Specifically, commenters requested that the BLM provide further explanation regarding designation of the Twin Creek ACEC and the Government Draw/Upper Sweetwater Sage-Grouse Reference and Education Area.</p> <p>Other commenters stated the BLM did not provide enough detail in the ACEC analysis to support designation, and made several specific requests that the BLM improve and/or disclose ACEC data and improve the analysis for ACECs, including (1) disclosure of completed ACEC evaluation forms, (2) an opportunity to cooperate and/or coordinate with the BLM in completing the ACEC evaluations, (3) detailed descriptions of allowable activities in ACECs, (4) correction of discrepancies in ACEC acreage, and (5) improved ACEC maps, including displaying National Historic Trail (NHT) features on ACEC maps.</p>	<p>The BLM analyzed a range of prescriptions for ACEC management, including allowable uses and activities in each ACEC as described in Chapters 2 and 4. The ACEC Report documents the evaluation process for existing and newly proposed ACECs. The report outlines how each proposed ACEC meets or does not meet the relevance and importance criteria. The report is available on the BLM website at: <a href="http://www.blm.gov/pgdata/etc/medialib/blm/wy/programs/planning/rmps/lander.Par.74315.File.dat/ACEC.pdf">http://www.blm.gov/pgdata/etc/medialib/blm/wy/programs/planning/rmps/lander.Par.74315.File.dat/ACEC.pdf</a>.</p> <p>While the overall ACEC designations in the Proposed Resource Management Plan (RMP) and Final EIS are the same as in the Draft RMP and EIS, management of some of the ACECs has been altered to address comments. In order to better protect resource values, including greater sage-grouse, the BLM is recommending withdrawal of 306,360 acres of land in the Hudson to Atlantic City, including the Twin Creek ACEC. The BLM is no longer designating the Government Draw/Upper Sweetwater Sage-Grouse Reference and Education Area which had previously encompassed the Twin Creek ACEC because the revised management approach provides adequate protection for resources. In the case of greater sage-grouse, the area will support ongoing and future research that will benefit greater sage-grouse and industry statewide.</p> <p>The BLM updated the Proposed RMP and Final EIS to include additional citations to the ACEC report and other sources as appropriate to support the determinations, and made various editorial changes and provided clarifying text as needed. The BLM also reviewed existing Geographic Information System (GIS) data and mapping products for ACEC locations, and made changes where appropriate based on comments received.</p>

Issue	Summary Number	Summary Comment	Summary Response
Climate Change	2003-1	<p>Commenters expressed concern that although impacts from climate change are described in the document, the BLM does not provide management actions to address those impacts. Some commenters insisted the BLM incorporate more climate change planning in the RMP and EIS. Other commenters recommended addressing additional resources affected by or that could affect climate change, such as the role of BLM-authorized activities in climate change and specifically the use of uranium to generate electricity.</p>	<p>The BLM's primary approach to address impacts from climate change is to improve range conditions in accordance with the Wyoming Standards for Healthy Rangelands by managing livestock grazing and vegetation treatments. The BLM believes the Proposed RMP is proactive in conserving wildlife habitat so that wildlife populations can survive in a changing climate.</p> <p>The authorized activities that could contribute to climate change are identified and addressed in the Proposed RMP and Final EIS. However, addressing the use of uranium to generate electricity is beyond the scope of the RMP.</p>
Congressionally Designated Trails	2004-1	<p>Commenters indicated general concern regarding the proposed uses and protection of Congressionally Designated Trails in the planning area. In addition, commenters stated impacts from trail management and other development, such as uranium development, were not fully assessed. Specific concerns included the limitations of surface-disturbing activities within 5 miles of a Congressionally Designated Trail, a lack of adequate justification for Congressionally Designated Trails protection, and a need for the BLM to incorporate direction contained in the 2009 Continental Divide National Scenic Trail Comprehensive Plan. Commenters provided suggested language and actions for the BLM to incorporate in its management of the Congressionally Designated Trails.</p> <p>Commenters also identified a number of technical edits related to the Congressionally Designated Trails analysis, including requests to use alternative language, corrections to technical statements and/or terms, requests to define terms, clarification of language, and corrections to GIS maps depicting the Congressionally Designated Trails.</p>	<p>The BLM has updated the Proposed RMP and Final EIS to reflect commenter recommendations regarding uses of and protections offered to Congressionally Designated Trails, including limitations on surface-disturbing activities within 5 miles of Congressionally Designated Trails, use of alternative language, corrections to technical statements and/or terms, requests to define terms, clarification of language, and corrections to GIS maps depicting the Congressionally Designated Trails. The BLM has reviewed and incorporated the tenets of the 2009 Continental Divide National Scenic Trail Comprehensive Plan into the Proposed RMP and Final EIS.</p>

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Cultural Resources	2005-1	<p>Commenters requested the BLM include additional analysis and data regarding impacts to cultural resources. Specifically, commenters indicated the BLM should disclose general information regarding the location of cultural sites, so livestock grazing permittees and oil and gas operations would know the locations where the described restrictions will be enforced. Commenters requested that the BLM acknowledge that oil and gas development has led to beneficial impacts on cultural resources through site-specific assessments required by the BLM. Commenters suggested other topics that the BLM should consider addressing in the Proposed RMP and Final EIS, such as protecting and managing livestock grazing as a traditional use eligible for listing on the <i>National Register of Historic Places</i>, and documenting the importance of using the historic trails for historic reenactments to The Church of Jesus Christ of Latter-day Saints.</p> <p>Commenters also requested clarification on the use of terms, the correction of citations, and the location of the discussions of cultural and historic properties.</p>	<p>The BLM will work with oil and gas companies to accommodate development plans in Designated Development Areas (DDAs) where cultural sites are present, and work with grazing permittees regarding proposed range infrastructure projects to avoid adversely impacting cultural sites.</p> <p>Livestock grazing as a use is not covered under the National Historic Preservation Act, which directs federal agencies to identify, evaluate, and assess effects to historic properties that are eligible for listing on the <i>National Register of Historic Places</i>. Properties associated with livestock grazing can be found eligible for National Register listing, but livestock grazing as a use cannot be considered as a historic property.</p> <p>The BLM added text to Chapter 4 recognizing knowledge can be gained from recordation and data recovery related to oil and gas development. However, this information is gathered to reduce adverse effects to cultural resources, and the overall effect from disturbance of cultural resources is still adverse rather than beneficial. The BLM also added text to Chapter 3 acknowledging the importance of the NHTs to The Church of Jesus Christ of Latter-day Saints.</p> <p>The BLM reviewed the document and made edits as necessary to clarify language and correct citations.</p>
Cultural Resources	2005-2	<p>Commenters requested that the BLM add more information regarding oil and gas operator cooperation with the BLM and other stakeholders to reduce potential visual impacts to cultural resources. Multiple commenters indicated that the BLM has not provided justification for requiring special management or protection for regionally significant historic trails and early highways, and justification for buffer distances for cultural sites and historic trails. A commenter recommended that several management actions under Alternative B that increase protections for cultural resources be added to Alternative D. In addition, a commenter questioned how the BLM would manage the proposed Heritage Tourism and Recreation Management Corridor, and another commenter expressed concern about the extent of BLM involvement in identifying sites for consideration for National Register listing that occur on state or private land.</p>	<p>The BLM added text to Chapter 4 to reflect agreements where special guidelines to reduce visual impacts on cultural resources have been incorporated into field-wide operations.</p> <p>Section 106 of the National Historic Preservation Act directs federal agencies to identify, evaluate, and assess effects of its undertakings on historic properties that are eligible for listing on the <i>National Register of Historic Places</i>. The BLM and State Historic Preservation Office (SHPO) have found all cultural sites, NHTs, and Regionally Significant Historic Trails and Early Highways identified in the Draft RMP and EIS eligible for nomination to the National Register. All of the NHTs and early highways have segments that are considered “contributing” to their National Register qualities and portions that are considered “non-contributing.” The BLM is required to protect the eligibility of the cultural sites, NHTs, and</p>

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			<p>Regionally Significant Historic Trails and Early Highways, and has prescribed buffers to protect the important values of these resources.</p> <p>The BLM determined the protections prescribed under the Proposed RMP (Alternative D) were adequate to protect cultural sites in the planning area. Many of the protections under Alternative B are provided in other management actions (e.g., Special Designations) under the Proposed RMP. Chapter 2 describes the management prescriptions in detail.</p> <p>The BLM's Cultural Resources 8100 Manual provides guidance for the BLM's responsibilities for cultural resources on non-federal lands. The extent of the BLM's responsibility for identifying and protecting non-federal cultural resources is limited by the degree to which BLM decisions determine or control the location of activities on non-federal lands that could affect cultural resources (see BLM Manual Section 8140.O6D). Identification and/or mitigation of adverse effects may be required as a condition of a lease, permit, or license issued by the BLM, whether federal or non-federal lands are involved.</p>
Cumulative Impacts	2006-1	<p>Commenters recommended that the BLM further analyze cumulative impacts regarding multiple resources, resource uses, special designations, and socioeconomic conditions. Specifically, commenters requested a higher degree of analysis of cumulative impacts to NHTs, greater sage-grouse, vegetation communities, agriculture, and oil, gas, minerals, and timber industries. Commenters also indicated a need for different models to assess cumulative socioeconomic impacts on the public in the planning area and offered technical corrections for information included in the analysis.</p>	<p>Overall, the BLM determined the current cumulative impacts analysis is appropriate and adequately informs the decision-making process. The BLM revised the cumulative impacts section to update citations related to statewide air emission inventory and the Wyoming Governor's Greater Sage-Grouse Core Area Protection Executive Order 2011-5, and update information and/or provide clarifications, as appropriate. Regarding the need to address socioeconomic impacts, the BLM has adopted the Impact Analysis for Planning Model (IMPLAN) analysis for use in its planning activities; while other models are available, IMPLAN provides an appropriate tool for comparing alternatives.</p>

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Editorial, Readability, and Data Issues	2007-1	<p>Commenters recommended a number of editorial revisions in the Draft RMP and EIS including spelling and grammar corrections. Commenters also recommended additions and revisions to the glossary, incorporating updated guidance, adding specific terminology or clarifying language, and improving readability.</p> <p>Commenters pointed to several inaccuracies and inconsistencies in numbers and data as presented in the Draft RMP and EIS and requested that the BLM ensure that tables and figures are verified by GIS datasets; develop a detailed reference list that includes all GIS layers used; correct discrepancies in acreage; and incorporate pertinent spatial datasets. In addition, a commenter requested that the BLM provide a detailed list of sources for all GIS data layers referenced in the text.</p>	<p>The BLM evaluated all requests regarding readability, editorial suggestions, reference citations, and suggested additions and corrections, and revised the document, as appropriate. In addition, the BLM reviewed GIS data, methods, and mapping products and revised and updated shapefiles, tables, acreage, and maps, as appropriate. GIS data cited in the RMP includes hundreds of GIS files (e.g., shapefiles, raster datasets, and geodatabase feature classes), which provide all data and map sources referenced in the EIS. Additional information about GIS calculations presented in the EIS is provided in the Administrative Record. Revisions made in the Proposed RMP and Final EIS are identified by shaded text.</p>
Environmental Justice	2008-1	<p>The commenter asserted that the RMP does not adequately analyze environmental justice because it fails to measure impacts to individual communities.</p>	<p>The BLM believes the analysis in the RMP and EIS adequately addresses environmental justice issues, including minority or low-income communities or populations as defined in Executive Order 12898, <i>Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations</i> (February 11, 1994), and guidance provided by BLM Instructional Memorandum (IM) 2002-164 (<i>Guidance on Environmental Justice in Planning</i>).</p>
Extension and Hard Copy Request	2009-1	<p>Commenters requested that the BLM extend the comment period 45 to 90 days, to allow more time to review the Draft RMP and EIS and formulate comments. Several commenters also requested hard-copy versions of the Draft RMP and EIS.</p>	<p>The BLM extended the public comment period for 45 days. The BLM printed a limited number of hard-copy documents. Hard copy versions were available at public libraries throughout the planning area.</p>
Fire and Fuels Management	2010-1	<p>Commenters identified a number of technical edits related to fire and fuels. These edits included requests to use alternative language, corrections to technical statements and/or terms, definitions of terms, and clarification of language. In addition, commenters provided suggested changes to Management Actions Common to All Alternatives.</p>	<p>The BLM has updated the text of the Proposed RMP and Final EIS to reflect commenter recommendations regarding clarifying language and guidance, and to reflect commenter recommendations regarding the proposed addition to Management Actions Common to All Alternatives.</p>

Issue	Summary Number	Summary Comment	Summary Response
Fish	2011-1	<p>Commenters asserted that the RMP and EIS does not adequately analyze certain impacts to fish and fish habitat, including (1) impacts from oil and gas development to sensitive coldwater fish species, (2) buffers for intermittent and ephemeral streams, and (3) long-term and short-term impacts to fish longevity. Commenters recommended increasing protections for fish by designating streams as unique fisheries and increasing stream buffer protections for perennial streams. Commenters also made various data requests related to fish management, including adding a map and correcting errors in a map.</p>	<p>The BLM revised the Fish sections of the Proposed RMP and Final EIS based on commenter input where appropriate. Details pertaining to sensitive coldwater fish are presented in the Special Status Species section, and are not discussed in the Fish section. Discussions regarding buffers for fish-bearing streams are provided in the document where appropriate and in compliance with the BLM Wyoming policy. Chapter 4 discusses type and duration of impacts on fish longevity; however, these timeframes are used primarily as reference periods in which to conduct the analysis and do not necessarily apply to analysis of individual species.</p> <p>The BLM reviewed GIS data and mapping products, and revised and/or updated GIS shapefiles, text, acreage, and maps, as appropriate, in the Proposed RMP and Final EIS.</p>
Greater Sage-Grouse	2012-1	<p>Commenters expressed a varying range of opinions over whether greater sage-grouse protections are insufficient, overly restrictive, or are otherwise inconsistent with various regulations and guidance documents for greater sage-grouse, including the BLM State Director’s IM No. WY-2010-012, the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Order 2011-5, and/or the 2011 National Technical Team (NTT) Report on National Greater Sage-Grouse Conservation Measures. Commenters requested additional scientific reasoning for instances in which the BLM decisions were regarded as inconsistent with existing regulations and guidance. Specific issues of concern included (1) the expansion of timing limitations and night-time stipulations on surface-disturbing activities, (2) the authorization of new transmission lines, (3) the inclusion of leks with undetermined occupancy in the BLM analyses, and (4) appropriate criteria and methodologies for determining habitat, Core Area, buffer distances, and disturbance caps.</p> <p>Several commenters noted oil and gas development on private lands are subject to restrictions in the Core Area strategy. Commenters also noted that the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Orders 2008-4 and 2010-4 have been replaced by Executive Order 2011-5, and</p>	<p>The BLM updated the alternatives, analyses, and other applicable sections related to greater sage-grouse to reflect changes in management to be consistent with National and Wyoming policies and guidance on the management of greater sage-grouse and their habitat. The Proposed RMP and Final EIS maintains overall consistency with the Core Area strategy, outlined in the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Order 2011-5, and includes additional conservation measures recommended in the NTT Report. The BLM supplemented Appendix H (p. 1521) with additional BMPs and Required Design Features for greater sage-grouse protection that were identified in the NTT Report. While the BLM did not incorporate all conservation measures recommended in the NTT Report into the Proposed RMP, the BLM believes all applicable conservation measures were considered in one or more of the alternatives analyzed. The NTT Conformance Table, available on the Lander RMP website (<a href="http://www.blm.gov/wy/st/en/programs/Planning/rmps/lander.html">http://www.blm.gov/wy/st/en/programs/Planning/rmps/lander.html</a>), provides additional information about how the BLM incorporated conservation measures into the Proposed RMP and Final EIS.</p> <p>The Proposed RMP and Final EIS includes a range of reasonable alternatives for greater sage-grouse management</p>

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		<p>that any references or associated language should be updated to reflect the most recent Executive Order.</p> <p>Commenters requested that Alternative D avoidance and exclusion maps based on greater sage-grouse habitat types be updated to remain consistent with the provisions in the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Order 2011-5.</p>	<p>and the BLM revised the document to include additional and updated information on greater sage-grouse Core Area management, including changes to management actions and an updated definition of Core Area in the Glossary. Additionally, the BLM verified the analysis and incorporated the latest greater sage-grouse Core Area data from the Wyoming Game and Fish Department (WGFD) as of the end of the public comment period.</p> <p>The BLM added language in Chapter 4 to clarify that private lands are not subject to BLM Core Area or non-Core Area stipulations; however, oil and gas activities on private land would be subject to Core Area stipulations promulgated by the Wyoming Oil and Gas Conservation Commission and the Wyoming DEQ.</p> <p>In addition, the BLM reviewed the Alternative D corridor maps in relation to the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Order 2011-5 and identified several appropriate changes, although the BLM did not make all the changes commenters suggested.</p>
Greater Sage-Grouse	2012-2	<p>Commenters indicated that the analysis of greater sage-grouse could be improved by including more descriptive explanations, additional rationale and analysis criteria, clarification of terminology, and scientific references. Specifically, commenters questioned or raised concerns pertaining to (1) greater sage-grouse impacts on and from livestock grazing management, particularly regarding the impacts of water development and fencing on nesting cover, (2) impacts to greater sage-grouse from oil and gas development, (3) spatial inconsistencies between Core Area depicted in the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Order 2011-5 and those delineated by the BLM, (4) inadequate historical context and data on greater sage-grouse populations in the region, (5) use of the Density Disturbance Calculation Tool, and (6) in some cases, commenters cited specific research the BLM could reference to inform agency decisions regarding greater sage-grouse impacts on and from other resources.</p>	<p>The BLM revised the analyses in applicable sections on greater sage-grouse in the Proposed RMP and Final EIS, including clarification of impacts associated with or from livestock grazing and oil and gas development, consistency with the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Order 2011-5, and supplemental text and supporting scientific references, as appropriate.</p>

Issue	Summary Number	Summary Comment	Summary Response
Greater Sage-Grouse	2012-3	<p>Commenters offered specific recommendations and critiques, and requested additional clarification for a variety of greater sage-grouse management provisions in the RMP and EIS, including prescriptions related to buffer size, habitat connectivity, disturbance caps, fencing, water development, seasonal timing limitations, noise, noxious weeds, and ravens. Commenters also suggested revising the biological resource goals to clarify the BLM's intent to maintain and preserve connections between greater sage-grouse habitat while providing for multiple-use management. A number of commenters requested that the BLM clarify restrictions on wind-energy development, particularly in Core Area.</p>	<p>The BLM revised management actions and applicable sections on greater sage-grouse in the Proposed RMP and Final EIS. Specifically, the BLM updated text to ensure consistency with the Wyoming Governor's Greater Sage-Grouse Core Area Protection Executive Order 2011-5, include additional scientific citations, clarify restrictions associated with wind-energy development in Core Area, and require anti-perching and predation deterrents, and made other revisions, as appropriate.</p>
Health and Safety	2013-1	<p>Commenters questioned the bonding provision for surface-disturbing activity in the RMP and EIS, with some commenters suggesting expanding the requirements to better protect public health and safety and making the bonding provision cover ecological function. Other commenters opposed the bonding provision, suggesting it was adequately covered in the BLM policy and federal regulations and therefore not necessary to address in the RMP and EIS.</p>	<p>The Lander Field Office does not have the authority to determine how operators are bonded. BLM policy is to bond as accurately as possible to ensure full reclamation from mining activities to the desired future condition. The BLM guidance supports addressing bond requirements in a planning document.</p>
Invasive Species	2014-1	<p>Commenters expressed concerns that the overall approach to invasive species management is insufficient to prevent the spread of invasive species, and is onerous to operators who must comply with measures to prevent invasive species spread. Commenters proposed changes to reclamation requirements regarding invasive species including (1) reconsidering the timeframe required to successfully establish shrubs and forbs after reclamation, (2) reducing the standard for percent allowable invasive nonnative species in non-DDAs, and (3) reconsidering the objectives for final reclamation in non-DDAs. Commenters also suggested additional actions to reduce invasive species spread, such as implementing a plan to reduce cheatgrass invasion.</p> <p>Commenters also suggested revisions to clarify and correct inconsistencies and purported inaccuracies in the text related to livestock grazing and spread of invasive species, lists of noxious weeds, weed transmittal, and interim reclamation standards.</p>	<p>After further review, the BLM believes the overall approach to invasive species management in the Proposed RMP and Final EIS is adequate. Reclamation standards are designed to prevent the spread of invasive species and vary between DDAs and non-DDAs. Reclamation objectives in non-DDAs must meet a higher standard than in DDAs because non-DDAs include identified resources such as greater sage-grouse Core Area or other important wildlife and plant species. The basis for reclamation standards in non-DDA areas is restoration of habitat similar to that prior to disturbance. Reclamation standards do not establish timelines for considering when reclamation is successful.</p> <p>The BLM has updated the Proposed RMP and Final EIS to address inconsistencies and provide additional clarity as needed. Specifically, the BLM revised text to correct an inconsistency related to interim reclamation standards in Chapter 4.</p>

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Lands and Realty	2015-1	Commenters requested land tenure adjustments for multiple reasons, including public shooting ranges, recreation opportunities, wildlife protection, and livestock grazing.	The BLM revised Appendix R (p. 1623) to include new parcels identified for land tenure adjustment, correct errors in legal descriptions, and add parcels that were inadvertently omitted in the Draft RMP and EIS. Parcels added would provide for a public shooting range, and consolidate isolated parcels used for livestock grazing. The BLM is currently working with the State of Wyoming on an agreement to exchange lands for recreation and wildlife values.
Laws, Regulations, Guidance, Process	2016-1	Commenters stated the Draft RMP and EIS did not contain sufficient historical or baseline data for assessing impacts, provided an inadequate analysis of impacts, and that the BLM did not follow relevant FLMPA and NEPA processes or comply with BLM policy and Council on Environmental Quality guidance and other relevant laws and land use plans. Commenters asserted the BLM did not fully involve interested parties, stakeholders, and/or cooperators during development of the RMP and EIS or its alternatives, or share data with interested parties.	The BLM has reviewed and ensured compliance with FLPMA, NEPA, and other relevant laws, policy, and land use plans. As revised, the BLM believes the Proposed RMP and Final EIS adequately analyzes impacts from proposed management and includes sufficient historical or baseline data for assessing impacts. The BLM has met its collaboration/cooperating agency requirements in accordance with FLPMA and public involvement requirements under NEPA. The BLM has provided non-confidential data to entities that have made such requests.
Leasable Minerals – Geothermal	2017-1	<p>Commenters expressed general concerns regarding potential impacts from geothermal development on sensitive resources. Specifically, commenters stated that the buffer restricting geothermal development near the National Landscape Conservation System trail corridor is not large enough to protect the values of the corridor and is not consistent with management of the proposed special recreation areas, ACECs, and trail management areas that would be established along the National Landscape Conservation System corridor.</p> <p>Several commenters referenced new data showing geothermal energy potential in the Dubois area, and requested the BLM review and incorporate this new data into the Proposed RMP and Final EIS. In addition, commenters requested that the BLM more accurately describe the history of geothermal leasing in the planning area, including the fact that the BLM did not analyze geothermal leasing in the 1987 RMP.</p>	<p>The National Landscape Conservation System trail corridor is managed with an NSO stipulation and beyond that is subject to Visual Resource Management (VRM) limitations. The BLM believes this management provides sufficient protection of values in the corridor.</p> <p>The BLM has considered the new data regarding geothermal energy potential in the Dubois area. However, given the important wildlife values that are incompatible with geothermal development, the Dubois area is closed to geothermal leasing. Alternative A recognizes that the 1987 RMP did not analyze geothermal resources.</p>

Issue	Summary Number	Summary Comment	Summary Response
Leasable Minerals – Oil and Gas	2018-1	Commenters expressed a number of concerns related to DDA establishment, expansion, and development constraints. In this regard, commenters requested detailed information explaining how DDA boundaries are determined, and clarification on the applicability of various development stipulations occurring therein. Commenters specifically recommended that the BLM (1) provide a mechanism that would allow the future expansion of DDAs without requiring an RMP amendment, (2) limit the application of standard stipulations and/or COAs for operations in DDAs, particularly if they would compromise valid existing lease rights or curtail mineral production, (3) remove seasonal protections in DDAs, and (4) reconfigure DDA boundaries to avoid overlap with the Ninemile Draw Important Bird Area.	The BLM has updated the Proposed RMP and Final EIS to reflect changes, including application of DDA stipulations, conducting year-round operations in DDAs, and waiver procedures for seasonal protections for operations in DDAs. The BLM has determined that an expansion of the DDAs would require an RMP amendment.
Leasable Minerals – Oil and Gas	2018-2	Given the minimal, short-term surface disturbances caused by geophysical exploration, commenters asserted that these activities should not be limited to the same extent and in the same areas where oil and gas development is prohibited. Furthermore, commenters argued that removing limitations on the collection of geophysical data would reduce future disturbances by reducing the number of wells required to locate and produce the targeted resource. Commenters also questioned if the BLM has legal authority to encourage the sharing of seismic data between operators.	The BLM has determined that, at a minimum, geophysical exploration is a disruptive activity. The BLM does not agree that a blanket closure is inappropriate since an exception may be obtained. The BLM can encourage the sharing of data that would reduce the demand for additional surveys and associated impacts to other resources.
Leasable Minerals – Oil and Gas	2018-3	Commenters expressed general concern that lease stipulations and mitigation measures for mineral development in the RMP and EIS are more restrictive than necessary based on FLPMA and Energy Policy Act of 2005 mandates. Specifically, commenters requested more detailed descriptions and reasoning regarding (1) the amount of acres closed to mineral development and subject to NSO and other stipulations, (2) how oil and gas development in the planning area will be managed for and affected by wildlife stipulations proposed in the alternatives, (3) economic impacts associated with closures, major constraints, and seasonal prohibitions placed on mineral leasing in the planning area, and (4) assurances that proposed stipulations will not interfere with valid existing lease rights. Commenters made specific requests for the BLM to revise management of oil and gas, such as allowing basic maintenance and emergency actions for oil and gas operations year-round despite proposed seasonal closures and timing limitations. Other commenters	The BLM has reviewed and updated the Proposed RMP and Final EIS to ensure consistency with applicable state and federal laws and policy. Specifically, the BLM revised text regarding the validity of existing lease rights, included the most current BMPs, used the Density Disturbance Calculation Tool for surface-disturbance evaluations in greater sage-grouse Core Area, more clearly described where NSO stipulations apply, and modified designated corridors for pipeline routes. The Proposed RMP and Final EIS incorporates the Core Area strategy, which includes surface-disturbance caps and limits on the number of energy developments. A substantial amount of Core Area is NSO for the protection of a variety of resources, including other wildlife and trails. The BLM reviewed the economic analysis, and believes the Proposed RMP and Final EIS adequately analyzes the impacts to the local and regional economy from oil and gas management.

Issue	Summary Number	Summary Comment	Summary Response
		<p>avored the implementation of additional closures, and/or recommended additional BMPs and mitigation measures for oil and gas development.</p> <p>Commenters also requested the BLM give further consideration and incorporate additional analysis associated with emergent technologies including Enhanced Oil Recovery (EOR), horizontal well drilling, and CO<sub>2</sub> sequestration.</p>	<p>The BLM has considered emergent technologies in the Proposed RMP and Final EIS and made appropriate revisions, including modifying designated corridors to provide more pipeline routes.</p>
Leasable Minerals – Oil and Gas	2018-4	<p>Commenters expressed opposition to the Beaver Rim Master Leasing Plan (MLP) because it would be redundant in light of the existing alternative analysis and associated resource protections presented in the RMP and EIS. Therefore, commenters requested that more detailed reasoning and decision criteria be provided to determine whether the application of an MLP is warranted. One commenter in favor of the Beaver Rim MLP suggested that additional restrictions be placed on development near known occurrences of desert yellowhead.</p>	<p>IM 2010-117 authorized the BLM to consider proposals for and identify areas suitable for management as an MLP. The BLM received five nominations for MLPs, although only the Beaver Rim area was carried forward for detailed analysis. Chapter 2 includes the identification and consideration of all five proposed MLP areas, and Chapter 3 provides additional details regarding the Beaver Rim MLP. No additional analysis on MLPs is anticipated until a new MLP area is proposed. The BLM already has management in place that addresses the protection of desert yellowhead.</p>
Leasable Minerals – Oil and Gas	2018-5	<p>A commenter requested that the BLM require the disclosure of compounds in produced water and their concentrations to better assess potential impacts to nearby water resources. The commenter requested that the BLM establish additional provisions regulating the disposal of produced water.</p>	<p>The BLM does not have authority to establish provisions that regulate the disposal of produced water because the State of Wyoming regulates these actions.</p> <p>The BLM analyzed and included text in the Proposed RMP and Final EIS regarding potential for impacts to BLM-administered lands associated with produced water, with reference to State of Wyoming pollutant levels.</p>
Leasable Minerals – Oil and Gas	2018-6	<p>Commenters stated that the analysis of the Reasonable Foreseeable Development (RFD) underestimates the potential for the discovery of minerals and oil and gas reserves, noting the large number of potential well sites identified in recent development proposals. Furthermore, commenters stated that the RMP and EIS does not adequately analyze development potential associated with horizontal drilling and the associated surface disturbance impacts of fewer numbers of larger well pads. Many commenters requested that the BLM include additional clarification that the RFD does not represent a planning decision or development “cap”.</p>	<p>The BLM believes the RFD provides an appropriate estimate of future development for purposes of comparing alternatives, given the data available and the uncertainty in future oil and gas development. The BLM revised the Proposed RMP and Final EIS to further clarify that the RFD is an estimate of mineral development potential and is in no way a limitation on future oil and gas development in the planning area. The BLM uses the RFD as a tool to compare impacts across the alternatives. Site-specific impacts, including surface disturbance from horizontal drilling, or impacts on air resources are best analyzed project by project.</p>

Issue	Summary Number	Summary Comment	Summary Response
Leasable Minerals – Oil Shale	2019-1	<p>Commenters stated that the RMP and EIS failed to accurately account for the potential for development of oil shale formations in the planning area. Commenters argued that the BLM’s decision to restrict future oil shale development to currently producing areas contradicts the agency’s multiple-use and sustained yield mandates. One commenter suggested that alternative language be used to explain the BLM standard for processing oil shale applications.</p>	<p>The BLM modified text in the Proposed RMP and Final EIS to clarify that “oil shale” development in the context of the RMP refers to unconventional oil shale-tar sand development, and not to conventional oil and gas operations in shale formations. The BLM believes the overall approach to oil shale-tar sands in the RMP and EIS is adequate and is consistent with the BLM’s multiple-use mission.</p> <p>The BLM revised the text related to processing applications. The statement was meant to indicate that the lease could not be approved without a land use amendment. An application could be denied as inconsistent with the Proposed RMP and Final EIS, because oil shale-tar sands were not analyzed and leases were not authorized.</p>
Leasable Minerals – Other Solid Leasable Minerals	2020-1	<p>Commenters asserted that the BLM failed to accurately depict phosphate development potential in the planning area, and that management was too restrictive in areas with high phosphate development potential. Specifically, commenters expressed concern that (1) discussion of phosphate potential based on current market conditions is not accurate, (2) phosphate resources in the planning area have not been fully identified, (3) the BLM has not acknowledged that technology has improved, providing access to phosphate resources that were previously considered inaccessible, including underground mining methods, and (4) the discussion of adverse impacts to phosphate development are not accurate.</p> <p>Commenters also noted various inconsistencies in the RMP and EIS, including surface disturbance stipulations in greater sage-grouse Core Area.</p>	<p>The discussion of phosphate potential and market conditions in the RMP and EIS relies on the Final Mineral Occurrence and Development Potential Report for the Lander Field Office, which used the most current information at the time it was written. Commodity prices for all minerals, including phosphate, are in constant flux; therefore, the discussion of prices and market conditions provides a snapshot of the time this section was written. However, in considering phosphate and other mineral development, the BLM takes a long-term view using the most current data available. The BLM modified the phosphate sections of the Proposed RMP and Final EIS to indicate that both underground and surface mining have been evaluated. The BLM reviewed the phosphate section, including the analysis, and revised it for inaccuracies or inconsistencies.</p>

Issue	Summary Number	Summary Comment	Summary Response
Livestock Grazing Management	2021-1	Commenters expressed concern about the Animal Unit Month (AUM) reductions proposed in the RMP and EIS, and questioned the scientific methods the BLM used to determine the location and amount of AUM reductions to minimize conflicts with other resources. Commenters requested additional information on current livestock grazing AUMs by allotment and preference and suspended AUMs.	The proposed RMP does not reduce or increase AUMs, but identifies the potential based on current rangeland health and the proposed alternative. The BLM discloses projected AUMs for each alternative in Chapter 2 and provides allotment categorization in Appendix K (p. 1547). In general, AUM adjustments are made through subsequent implementation-level analyses and decisions based on monitoring data and on-the-ground conditions. The BLM revised the AUM numbers/acreage where appropriate based on comments received. Additionally, the BLM added details that clarify AUMs by allotment and livestock type (i.e., cattle or sheep), provided additional references where appropriate, and inserted text that details why areas have not historically been available to grazing. The RMP only applies to federal lands in the Lander Field Office planning area. Private and state land AUMs and suspended AUMs are not part of the affected environment; therefore, it is inappropriate to include this information in the document.
Livestock Grazing Management	2021-2	Commenters sought clarification on the use of Comprehensive Grazing Strategies, including their definition, purpose, and requirements. Additionally, commenters requested clarification on the Comprehensive Grazing Strategy process, scale, criteria for development, and if a Comprehensive Grazing Strategy would replace the need for an Allotment Management Plan.	First, and foremost, Comprehensive Grazing Strategies are intended to maintain, and/or make substantial progress toward, fulfillment of the Wyoming Standards for Healthy Rangelands. The BLM has modified the discussion regarding Comprehensive Grazing Strategies in Appendix K (p. 1547) to clarify its definition and use. The revised discussion addresses the concerns regarding grazing intensity and season of use. The BLM revised the document to clarify that Comprehensive Grazing Strategies do not need to be a formalized management plan and do not replace the need for an Allotment Management Plan.

Issue	Summary Number	Summary Comment	Summary Response
Livestock Grazing Management	2021-3	<p>Commenters stated there was a lack of adequate disclosure of impacts and/or consequences associated with livestock grazing in the planning area and suggested revisions to the BLM's approach to livestock grazing management. Specifically, commenters requested more discussion on the economic impacts as a result of proposed livestock grazing management changes, impacts of livestock grazing to/from wildlife species (including special status species), and policies and specific management actions or changes in current management.</p> <p>Commenters also requested additional details pertinent to the livestock grazing management analysis, including (1) clarification of terminology, (2) supporting scientific citations for technical statements, (3) details on determination of utilization levels for allotments, (4) specific requirements and limitations placed on livestock grazing practices for the protection of other resources, and (5) clarification indicating if livestock management activities are or are not considered surface-disturbing activities.</p>	<p>The BLM developed and analyzed alternatives in the Proposed RMP and Final EIS using the best available information in compliance with federal laws, guidelines, and policies. The BLM used GIS data that analyzed fence placement, distance from water, precipitation, vegetation, and production, as well as competing resources, such as wild horses and wildlife, to estimate likely future impacts. This approach allowed the BLM to calculate input to the IMPLAN model so that the economic consequences of the alternatives could be compared. The BLM has revised Appendix K (p. 1547) to address how the agency addresses livestock grazing management and conflicts with other resources.</p> <p>In addition, the BLM reviewed and revised the Proposed RMP and Final EIS as necessary to include clarifying text/terminology, supporting scientific citations, and correct acreage and AUM figures, and to reflect the fact that the BLM does not consider livestock grazing or other herbivory to be a surface-disturbing activity. The Proposed RMP and Final EIS does not set utilization levels for livestock grazing, because those levels are established in site-specific allotment management plans.</p>
Livestock Grazing Management	2021-4	<p>Commenters requested additional information in the RMP regarding how the BLM considers range improvements, specifically regarding placement, implementation, and type of water sources; fence lines; and gate operations.</p>	<p>The BLM considers range improvements as needed to implement a Comprehensive Grazing Management Strategy. The agency will evaluate impacts resulting from any proposed range improvement in site-specific NEPA documents.</p>
Livestock Grazing Management	2021-5	<p>Commenters expressed concern about how the BLM is considering rangeland health, including the process for conducting and considering rangeland health assessments, and addressing allotments that failed to meet the Standards for Healthy Rangelands. Specifically, commenters requested additional details about the methods and procedures the BLM used to complete rangeland and livestock grazing allotment assessments, and how impacts of livestock grazing on other resources were included in the assessments.</p>	<p>The BLM is required to meet the Standards for Healthy Rangelands and conform to the Guidelines for Livestock Grazing Management in accordance with 43 CFR 4180.2. In areas that fail to meet Standards for Healthy Rangelands, the BLM will use the Guidelines to establish appropriate actions. The BLM will work with the permittees, state and local governments, and the interested public to address those standards on a site-specific basis analyzed under NEPA. The BLM has provided clarification in the Proposed RMP and Final EIS that changes to grazing management are implemented when rangelands are not meeting standards due to current livestock grazing, and provided details on the process for completing standards assessments.</p>

Issue	Summary Number	Summary Comment	Summary Response
Locatable Minerals	2022-1	<p>Commenters requested the BLM provide greater protections to resource values, such as greater sage-grouse habitat and ACECs, from locatable mineral activity, including increasing the acreage of withdrawals from mineral entry in an effort to further protect environmental, scenic, and cultural values in these areas.</p> <p>Other commenters asserted the BLM did not recognize the value or volume of uranium resources in the planning area, and requested the BLM include additional information on the mineral’s importance to the region and nation in providing clean and abundant energy and high-paying jobs.</p> <p>Commenters pointed out factual inaccuracies in the RMP and EIS about certain aspects of uranium operations in the planning area, such as the potential for surface and underground mining of uranium, in addition to in situ recovery. Commenters also requested updated and additional data and information in the RMP and EIS related to research on mineral potential and the location and impacts to individual mining claims.</p>	<p>The BLM updated management in the Minerals sections in the Proposed RMP and Final EIS identifying additional areas to pursue for mineral withdrawal, including along the Lander Front. In other areas, the Core Area strategy provides protection for greater sage-grouse and other resource values from locatable mineral activity. In addition, FLPMA Section 302(b) requires the BLM to prevent unnecessary or undue degradation of public lands. The BLM revised the Proposed RMP and Final EIS to clarify the process by which ACECs may be withdrawn on a case-by-case basis and provide the rationale for lands considered for withdrawal in greater sage-grouse Core Area, and made other revisions, as appropriate.</p> <p>The BLM believes the discussion of uranium in the RMP and EIS accurately depicts uranium’s importance and benefits in the planning area, and the magnitude of deposits.</p> <p>The BLM updated the Minerals sections in the Proposed RMP and Final EIS to reflect that, in addition to in situ recovery, open-pit and underground mining could be used to extract uranium in the planning area. The operational status of the Big Eagle Mine was updated as open. Regarding updating and using additional data, the BLM uses and incorporates the most current data available on mineral potential.</p>
Recreation	2023-1	<p>Commenters generally requested the BLM provide more opportunities for recreation activities and protect popular recreation areas from incompatible uses. Commenters suggested withdrawing certain recreation areas from mineral entry to preserve recreation opportunities, and designating other areas as Special Recreation Management Areas (SRMAs) or Extensive Recreation Management Areas (ERMAs) to manage for specific recreation opportunities.</p> <p>Commenters suggested other revisions and considerations to clarify the analysis of impacts and justify management prescriptions that would limit incompatible resource uses. For example, a commenter requested the BLM address how reduction in AUMS for some ranches could result in the loss of hunting and fishing opportunities on private property.</p>	<p>The BLM has identified areas in the Proposed RMP and Final EIS that will be withdrawn from mineral entry or designated as SRMAs or ERMAs. Where appropriate, the BLM revised the text in the Proposed RMP and Final EIS to clarify impacts and incorporate additional analysis. The BLM has revised the document to include analysis of loss of hunting and fishing on private properties, and updated the Proposed RMP and Final EIS to reflect potential impacts of the loss of AUMS to fishing and hunting on private ranches.</p>

Issue	Summary Number	Summary Comment	Summary Response
Renewable Energy	2024-1	<p>Commenters indicated that certain areas should be designated as exclusion and avoidance areas for wind-energy development to protect wildlife and maintain management consistency with other designated areas; other commenters requested that additional areas be opened to wind-energy development. Commenters requested a more defined management approach (as opposed to case-by-case management) and suggested larger buffers and BMPs to protect visual, wildlife, and other values. Multiple commenters requested that the BLM remove language regarding surface-disturbing caps on renewable and conventional energy development or add clarifying language that explains where and how surface-disturbing caps are applied.</p>	<p>The BLM has updated the Proposed RMP and Final EIS to reflect changes in areas that are designated as wind-energy development exclusion and avoidance areas, and limitations on wind-energy development in greater sage-grouse Core Area. The surface-disturbance caps referenced in Chapter 2 are for greater sage-grouse Core Area protection. The disturbance cap applies to all surface-disturbing activities in Core Area, including conventional energy development, and is consistent with the Governor's Executive Order for Core Area Protection.</p>
Rights-of-Way and Corridors	2025-1	<p>Several commenters expressed concern about management of communication sites, including expiration of leases (specifically communications facilities on Whiskey Mountain) and restrictions on placement of new communication sites.</p>	<p>The BLM is encouraging investments in modern communications infrastructure (e.g., such as fiber optics) while discouraging unplanned scattering of older technology (e.g., transmission towers) in locations that could result in adverse impacts. Applications for future sites in existing communication sites will have facilitated review, while applications for communication sites outside of approved or existing sites will require standard review under NEPA. The BLM updated Chapter 3 to incorporate additional information provided by commenters related to existing communication sites on Whiskey Peak, specifically identifying the various services provided by the sites.</p>
Rights-of-Way and Corridors	2025-2	<p>Commenters suggested revising the length and width of ROW corridors, consolidating corridors, and creating new corridors to accommodate additional or fewer pipelines, transmission lines, and other linear features. Connectivity between corridors already designated in other field office planning areas and corridors proposed in the planning area was a concern to commenters.</p> <p>Commenters also recommended map and data revisions to correct inaccuracies or inconsistencies, including where exclusion and avoidance areas overlap ROW corridors.</p>	<p>The BLM revised the ROW management and designated corridors in the Proposed RMP and Final EIS in applicable sections, including increasing capacity and connecting corridors where applicable. Some of the corridors identified by other field offices do not consider resource conflicts in the Lander Field Office planning area, such as the limited capacity of the Beef Gap area or the mining and U.S. Department of Energy activities in the Gas Hills. Coordination between field offices cannot always resolve complicated conflicts that might not be apparent at the time of the initial field office planning efforts. The BLM has incorporated changes in the Proposed RMP and Final EIS to adopt designated corridors from other field offices where possible.</p> <p>In addition, the BLM updated the maps to address commenters' concerns as appropriate, including revising ROW exclusion</p>

Issue	Summary Number	Summary Comment	Summary Response
			<p>and avoidance areas and designated corridors. The maps are for illustration purposes only – the management actions in the RMP are the decision.</p>
Rights-of-Way and Corridors	2025-3	<p>Commenters questioned the overall adequacy of the analysis in the ROW and Corridors section and requested additional rationale to support the proposed exclusion and avoidance areas under the Preferred Alternative. Some questioned if the ROWs and corridors were consistent with the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Order 2011-5. Commenters also suggested clarifying language and ways to improve the analysis, such as more discussion of management prescriptions for overhead transmission facilities, a more detailed discussion of reclamation of public land disturbance from an ROW permit, and adding definitions for “major” and “minor” ROW actions.</p>	<p>The BLM modified exclusion areas and avoidance areas and reviewed the RMP to ensure the document provided adequate analysis and justification for the areas. ROWs and corridors designated in the Proposed RMP and Final EIS are consistent with the Wyoming Governor’s Greater Sage-Grouse Core Area Protection Executive Order 2011-5.</p> <p>The BLM identifies corridors in the Proposed RMP and Final EIS, while specific management prescriptions related to transmission lines, such as continued access to the lines and emergency maintenance activities, are part of the implementation process. Reclamation of all BLM-approved disturbances is addressed in the Soil sections, Appendix D (p. 1477), and Appendix H (p. 1521); definitions of major and minor ROWs are provided in the Glossary; and current BLM policy will be incorporated in the permit during the application process for renewable energy projects.</p>
Riparian-Wetland	2026-1	<p>Commenters stated that the analysis did not fully describe or consider the importance and existing conditions of riparian-wetlands in the planning area. Specifically commenters asserted the BLM did not propose limitations or requirements, or provide clear objectives for management of these resources beyond the proper functioning condition. Commenters requested additional discussion on the impacts to riparian-wetlands resulting from livestock grazing activities, range improvements, and infrastructure developments.</p> <p>Commenters also questioned aspects of the BLM’s approach to riparian-wetland protection, including setbacks, mitigation, and monitoring, and whether they were in compliance with Executive Order 11990. Commenters suggested applying NSO stipulations around high-value riparian-wetlands as another method for protecting these highly productive areas.</p>	<p>The BLM reviewed all sections pertinent to riparian-wetlands management and determined that the stated goals and management in the Proposed RMP and Final EIS are appropriate.</p> <p>The BLM revised the text in the Proposed RMP and Final EIS, as appropriate, to provide technical corrections, additional text, and clarifications as needed. Specifically, the BLM added language pertaining to management of the proper functioning condition and evaluation of season-long grazing practices on riparian-wetlands. While the BLM agrees that additional stipulations, such as NSO, would provide a higher level of protection for riparian-wetland areas, the agency believes it more appropriate to consider such stipulations on a site-specific basis.</p>

Issue	Summary Number	Summary Comment	Summary Response
Salable Minerals	2027-1	<p>Commenters questioned the BLM’s closure of areas to mineral material disposal and the analysis that supported the closures. Commenters were particularly concerned about access to mineral material sites in the western portion of the planning area to maintain local roads. Commenters requested that the BLM reevaluate potential resource conflicts and acknowledge that environmental impacts associated with materials disposal sites can be successfully mitigated.</p>	<p>The BLM has determined that the Proposed RMP and Final EIS adequately addresses the commenters’ concerns regarding potential resource conflicts and materials disposal site mitigation, as currently written.</p> <p>Regarding closing portions of the western part of the planning area to mineral material disposal, the BLM does not believe this would adversely impact local road maintenance, because private sources appear able to meet the demand. However, closure of the South Pass area would not apply to the free use of mineral materials for the purposes of constructing and maintaining federally funded highways, as described in the BLM and Federal Highway Administration interagency agreement. In addition, the BLM has revised the discussion of management of the Dubois area to reflect that existing mineral material areas can continue to be used.</p>
Socioeconomic	2028-1	<p>Commenters questioned the adequacy of the analysis of social and economic impacts, and expressed concern about the impact of BLM management on local and regional economies. Commenters asserted the BLM did not adequately consider sources of revenue based on visitation, impacts to the local economy from withdrawing lands from mineral entry, impacts to the local economy from restrictions on oil and gas development, economic impacts from trends in the livestock industry, and economic impacts of new VRM I and II classifications. Other commenters suggested more discussion on topics such as the value of recreation to the Lander area economy, impacts of heritage tourism on the economy, and economic impacts of greater sage-grouse restrictions on oil and gas development.</p> <p>Other commenters addressed how pacing development was not the responsibility of the BLM, while others thought the provision should be expanded to include impacts on natural resources. Commenters expressed concern that an Economic Strategies Workshop was never conducted as required in the BLM’s Land Use Planning Handbook (H-1601-1)</p> <p>Commenters recommended including the Social and Economic Monitoring Plan developed by Dr. Robert Winthrop in the RMP and EIS. Commenters recommended that the BLM</p>	<p>The BLM has determined that the economic analysis adequately addresses commenters’ requests regarding further analysis of sources of revenue based on visitation, impacts to the local economy from withdrawing lands from mineral entry, impacts to the local economy from restrictions on oil and gas development, economic impacts from trends in the livestock industry, economic impacts of new VRM I and II classifications, and economic contribution of ranching, as currently written.</p> <p>It is entirely within the BLM's area of responsibility to ensure that authorized activities consider socioeconomic impacts, and the management would not limit operators' ability to ensure maximum ultimate recovery, nor would it inhibit their ability to respond to market conditions. Impacts on natural resources will be addressed on a site-specific basis as individual projects are developed.</p> <p>The BLM held an Economic Strategies Workshop in 2007 and has solicited input from Cooperating Agencies and members of the public through various forums throughout the revision process, thereby meeting the objectives in H-1601-1.</p> <p>The BLM will consider using the plan developed by Dr. Robert Winthrop in developing the indicators during implementation.</p>

Issue	Summary Number	Summary Comment	Summary Response
		<p>identify specific user groups (e.g., mineral extraction industries, renewable energy users, recreation users, including locals and visitors, environmental education organizations, and grazing users) and address conflicts that occur between groups.</p>	<p>The BLM has determined that the Proposed RMP and Final EIS as written adequately addresses the comments. Specific user groups and conflicts among users are fully described in the applicable sections of the RMP and EIS.</p>
Socioeconomic	2028-2	<p>Commenters stated that the socioeconomic analysis, and the IMPLAN model in particular, fail to provide an adequate picture of the local economy. Specifically, commenters stated the IMPLAN model did not adequately address the value to the local economy of ranching, recreation, local businesses such as National Outdoor Leadership School, and activities on public lands. Commenters suggested the Regional Economics Model, Inc., as an alternative to IMPLAN, and suggested additional data and analysis topics for the BLM to consider, including local recreation, statistics for surrounding communities, tax revenues at the state level, and economic impacts of air quality restrictions.</p>	<p>The BLM updated Chapter 3 to include additional information about the value to the local economy of local industry and businesses such as National Outdoor Leadership School. The BLM believes that the IMPLAN analysis is more suitable for the purposes of the RMP revision than the Regional Economics Model, Inc., and that it adequately analyzes local recreation, statistics for surrounding communities, tax revenues at the state level, and economic impacts of air quality restrictions.</p>
Soil	2029-1	<p>Commenters expressed a variety of opinions about whether management of soils in the RMP and EIS provided adequate protection or was overly restrictive, to the detriment of other resource uses. Commenters suggested ways the BLM could improve soil management by clarifying certain management actions (e.g., management of Limited Reclamation Potential [LRP] soils) and incorporating new scientific data and literature. Some commenters recommended the BLM place additional conditions on surface-disturbing activities, such as requiring the completion of a watershed protection plan and requiring further study and mitigation measures prior to allowing surface disturbances. Other commenters requested the BLM reduce the conditions on surface-disturbing activities.</p> <p>Commenters suggested that the analysis of soils in the RMP and EIS could be improved by including additional rationale and analysis criteria and a more quantitative analysis of soil erosion in the planning area, including a comparison of sediment contributions from natural and human sources. Commenters recommended that impacts to soils in the planning area from certain resources and activities be reassessed using these and other suggested methods.</p>	<p>The BLM has updated the Proposed RMP and Final EIS to clarify the agency's approach to soil management regarding analysis of LRP soils, surface discharge of produced water, natural causes of soil and water quality degradation, and impacts of fire. The BLM believes that limitations on surface-disturbing activities to protect soil resources are adequate. While applying further study or mitigation measures prior to allowing surface disturbance might provide beneficial protection to soil resources, this determination is more appropriately made on a site-specific basis. Similarly, soil erosion modeling is better performed on a project-specific basis when more detailed site and project data are available.</p>

Issue	Summary Number	Summary Comment	Summary Response
Soil	2029-2	<p>Numerous commenters suggested that the BLM more completely define, provide justification for, or otherwise revise its objectives and standards for reclamation and monitoring. Commenters requested that the BLM (1) clarify that reclamation plans would be required for oil and gas drilling operations under all alternatives and (2) provide additional information regarding reclamation plan requirements in LRP areas. Commenters offered many suggestions regarding the optimal balance between specific site-level prescriptions and more general comprehensive reclamation plans. Some commenters expressed their convictions that the proposed accountability mechanisms were insufficient for ensuring successful reclamation, as evidenced by poor revegetation success in existing reclamation areas.</p>	<p>The BLM has updated applicable sections of the Proposed RMP and Final EIS in response to comments, including adding additional information on Natural Resources Conservation Service (NRCS) Ecological Site Descriptions and LRP soils. Soil management requires a site-specific application and cannot be defined; neither can reclamation measures be identified at the RMP level. Specific reclamation objections are based on site-specific analysis.</p>
Special Status Species	2030-1	<p>Commenters stated that adverse impacts to certain special status species analyzed in the RMP and EIS were in some cases unsupported, exaggerated, and/or inconsistent with existing scientific literature and management directives. Commenters recommended the inclusion of additional scientific data, U.S. Forest Service (USFS) and U.S. Fish and Wildlife Service (USFWS) monitoring and management directives in the RMP and EIS, and the 2005 statewide Canada lynx Biological Assessment (BA).</p> <p>Specifically, commenters stated there were deficiencies or errors in the BLM's analysis of the historic range, occupancy, habitat, and adverse impacts resulting from timber management and grazing on Canada lynx, and the impacts of road density, timber management, and buffer size on northern goshawk. Commenters also requested additional evidence to substantiate stated adverse impacts from wild horses and fence construction on desert yellowhead and sensitive bird species, respectively. Commenters suggested that the BLM identify potentially occupied pygmy rabbit habitat in the planning area to substantiate the limitations placed on surface-disturbing activities.</p>	<p>The BLM developed and analyzed impacts to special status species in the Proposed RMP and Final EIS using the best available information in compliance with federal laws, guidelines, and policies. As appropriate, the BLM updated the analysis in applicable sections and added references that support decisions regarding special status species. Specifically, the BLM revised the Proposed RMP and Final EIS to include text to clarify the impacts of timber management, road density, and livestock grazing activities on special status species in the planning area.</p> <p>Pygmy rabbit habitat has not been identified for the entire planning area, and the BLM believes that including a map would be misinterpreted as being a complete depiction of habitat. Chapter 3 identifies what constitutes suitable habitat for pygmy rabbit, and the BLM has added text to expand the description of where occupied habitat has been identified.</p>

Issue	Summary Number	Summary Comment	Summary Response
Special Status Species	2030-2	<p>The BLM also received comments on the Draft BA that was released about the same time as the Draft RMP and EIS. One commenter noted that the section on the BA incorrectly reported (1) that no Canada lynx tracks were observed during surveys in the Dubois area and (2) omitted a subsequent Canada lynx detection in Long Creek. Other commenters questioned why the BLM would release the BA prior to selection of the Proposed RMP and recommended the BLM reduce the complexity of the BA.</p>	<p>The BLM has revised the BA and Chapters 3 and 4 of the Proposed RMP and EIS to reflect that Canada lynx have been found in the planning area, but have not been documented on BLM-administered lands. The BLM will announce its final decision on the Proposed RMP in the ROD; the decision is not governed by timing associated with the BA. The BLM believes the BA is appropriately written and not overly complex.</p>
Special Status Species	2030-3	<p>Commenters raised both specific and general concerns regarding the suitability of management determinations for special status species, and suggested that the BLM provide additional support and clarification for its management direction. Specifically, commenters requested (1) detailed information on BLM management direction and monitoring actions pertaining to special status species protection and habitat, (2) more consistency with USFS and USFWS management directives and determinations, (3) the removal of restrictions for special status species that the USFWS has withdrawn from consideration as threatened or endangered, and (4) greater protections and safety measures for listed species.</p>	<p>The BLM revised the Proposed RMP and Final EIS to reflect recent USFWS decisions, and incorporated, in coordination with the USFWS, USFS, and WGFD, commenter requests for specific revisions and clarifications, technical edits, changes to management actions, and updates to data and mapping, as appropriate. The USFWS and WGFD are the lead authorities responsible for the protection, management, and monitoring of all flora and fauna species in the planning area. Both the USFWS and WGFD provided guidance to the BLM, which is reflected in the special status species sections and management actions in the Proposed RMP and Final EIS.</p>
Trails and Travel Management	2031-1	<p>Commenters requested that the BLM change route designations to increase restrictions on travel, close areas to motorized and mechanized travel, and enact seasonal road closures to protect wildlife, water quality, wilderness values, and back country recreational experiences. One commenter expressed concern that changes in route designations would have adverse impacts to livestock grazing that are not disclosed in the document. Commenters recommended the BLM complete a comprehensive monitoring program and coordinate with stakeholders before changing route designations to protect wildlife values.</p> <p>Commenters also requested the BLM allow for the swift installation of snow fences, address all the road and recreation needs covered in the Fremont County Land Use Plan in coordination with the Fremont County Commission, and allow access to seasonally closed areas and alternative routes if route designations change to limited or closed. A commenter also suggested travel restrictions not apply to geophysical operators to preserve BLM administrative flexibility.</p>	<p>Several commenter requests do not require an RMP decision, are part of a separate process (e.g., Revised Statute 2477 rights or review of Plan of Operations), or will be addressed in the implementation phase in accordance with BLM guidance. Suggestions about specific route management can be made at implementation meetings where there will be opportunities for public input. Authorizations or permits that include motorized vehicle activities will address the use of motorized vehicles as part of the authorization or permit. The BLM added language to the tables of management actions in Chapter 2 to clarify the route designation process in an RMP. In addition, the BLM added Appendix W (p. 1813) to the Proposed RMP and Final EIS that provides additional information on travel management planning and decisions.</p>

Issue	Summary Number	Summary Comment	Summary Response
Vegetation	2032-1	<p>Commenters recommended multiple revisions to the Vegetation sections based on current knowledge of forest management, such as addressing discrepancies in buffer distances, replacing certain vocabulary, and incorporating BMPs. For example, commenters requested replacing the term “clear-cuts” because it has a negative connotation, and incorporating the Wyoming State Forestry Division’s Silvicultural BMPs guide.</p>	<p>The BLM updated management and applicable sections of the Proposed RMP and Final EIS, as appropriate. The BLM agrees with the characterization of clear-cut as a negative term; however, scoping clearly identified that clear-cutting needs to be addressed separately from other silviculture techniques. The BLM incorporated the Wyoming State Forestry Division’s Silvicultural BMPs in Appendix H (p. 1521).</p>
Vegetation	2032-2	<p>Commenters stated that the Draft RMP and EIS fails to implement management requirements or limitations to address the needs of vegetation communities when their health is threatened by other resource uses. Commenters suggested clarifying proposed vegetation treatments by adding a timeframe for recovery, and suggested revising a management action to include wildlife habitat objectives. Other commenters suggested management strategies to increase available forage for livestock, such as adding a management action that would allow for the BLM to apportion additional forage for livestock grazing when monitoring has shown that additional forage is available. Commenters also requested clarification on management terms, including “desirable vegetation communities.”</p>	<p>Management of all vegetation communities will be based on meeting Wyoming Standards for Healthy Rangelands and the NRCS Ecological Site Descriptions, which provide the reference state from which the standards are measured. The BLM will work with permittees/lessees, cooperators, and the interested public to meet Wyoming Standards for Healthy Rangelands. If standards in these communities fail due to livestock grazing, appropriate actions will be taken and incorporated into the comprehensive grazing strategies defined in Appendix K (p. 1547). Apportioning additional forage for livestock grazing use is already provided for by regulation and does not require changing management in the Proposed RMP and Final EIS.</p> <p>The BLM updated vegetation management in Chapter 2 to incorporate wildlife objectives. Proposed vegetation treatments will be identified in cooperation with the WGFD, and together the agencies will identify the specific objectives, including recovery timeframes, for the project. All potential projects will be subject to NEPA analysis and WGFD review related to the Density Disturbance Calculation Tool protocol.</p> <p>Desired plant communities will be based on the NRCS Ecological Site Descriptions and managed in a way designed to meet the Wyoming Standards for Healthy Rangelands. Desired plant communities allow for flexibility in management for specific wildlife habitats rather than historic climax plant communities.</p>

Issue	Summary Number	Summary Comment	Summary Response
Vegetation	2032-3	Comments regarding vegetation species composition in reclamation standards for DDAs and non-DDAs include revising text with clarifying language. For example, commenters requested clarification regarding seed mixes, determining species composition, fulfilling species composition percentage requirements, and seeding times and methods.	The BLM revised Appendix D (p. 1477) and applicable sections to address these comments. The standards the BLM uses for reclamation are based on the NRCS Ecological Site Descriptions, including seed mixtures and determining species composition by weight. Site-specific conditions or issues will be addressed in the individual project reclamation plan.
Visual Resource Management	2033-1	<p>Commenters expressed concern that designating areas with more stringent VRM classifications would adversely impact development operations, including oil and gas development on existing leases. One commenter questioned the need for a large area designated as VRM Class III across the Sweetwater watershed, noting that development in this area was not expected to necessitate a corridor of this size. Another commenter requested that the BLM consider designating the Beaver Rim MLP as VRM Class II in an effort to stay consistent with the surrounding area's VRM.</p> <p>Commenters also requested clarification on VRM, including providing a clear explanation of how VRM Classes were determined.</p> <p>Commenters requested that the BLM revise VRM maps to more accurately portray the level of development constraints and to show that the BLM VRM restrictions do not apply to privately owned or state-managed lands.</p>	<p>The BLM will not impose new VRM restrictions on existing oil and gas leases. Therefore, the BLM will work with operators to mitigate impacts to the best extent practical (see Washington Office IM No. 98-164). Regarding VRM Class III designation in the Sweetwater watershed, while the VRM Class III designation applies to a larger area, the ROW corridor is much narrower. In the Beaver Rim MLP, the VRM Class III designation reflects other uses in the area, and the BLM did not identify resources that require VRM Class II management.</p> <p>The visual resource inventory process is described in Chapter 3 and VRM Classes were developed in collaboration with the cooperating agencies. VRM Classes are not based just on inventory, but also desired management for the area.</p> <p>The BLM believes the identified maps accurately portray development constraints in VRM Class II areas. The BLM does not assert the right to apply VRM restrictions to state and private lands; the maps are illustrative of management, not management itself.</p>
Water	2034-1	<p>Commenters stated that the water resource analysis did not include recent data or current scientific reports pertaining to the characterization and classification of specific water resources and their uses in the planning area. Commenters stated that the analysis did not provide accurate data or baseline conditions for water resources indicators that would allow for an evaluation of potential impacts, including chemical, physical, and biological characteristics. Commenters also questioned the validity of statements and language used to support BLM management decisions pertaining to water quality standards and water levels in the planning area, and requested clarification on implementation of proposed BLM water monitoring actions. Finally, commenters stated that the analysis did not consider the beneficial uses of water produced by development activities,</p>	<p>The BLM has updated the Proposed RMP and Final EIS to address comments as appropriate. The agency updated applicable sections to include a discussion of impacts from nonpoint source pollution, clarify inventory and monitoring requirements, clarify impacts on groundwater, include analysis of sensitive drinking water resources, and included scientific references to support the analysis. The BLM determined that impacts of produced water are better analyzed on a site-specific basis, where actual water quality and stream conditions are known.</p>

Issue	Summary Number	Summary Comment	Summary Response
		including, but not limited to, improvements in natural water quality in planning area waterways, livestock/wildlife resources, and the creation of riparian zones and wetlands. Commenters also requested the BLM remove a statement asserting oil and gas techniques impact groundwater.	
Water	2034-2	<p>Commenters asserted that the BLM stated goals and objectives do not reflect those provided by the state, and requested justification or clarification concerning several management actions. Commenters also questioned the BLM’s authority to regulate surface water quality, which they noted was under the jurisdiction of Wyoming DEQ, and requested the BLM clearly state the Wyoming DEQ has primacy regarding water issues.</p> <p>Commenters noted several technical corrections and inaccurate statements pertaining to management of produced water and water quality standards, and suggested edits and/or items for inclusion. Commenters also requested that the BLM include additional protective management for water resources. Specifically commenters requested NSO restrictions in areas near drinking water resources and clarification on how water management actions and BMPs will be implemented and monitored.</p>	The BLM has updated the Proposed RMP and Final EIS in response to the comments. Changes were made to applicable sections regarding the use of pesticides and herbicides in water source areas, clarify that Wyoming DEQ regulates water quality, and update monitoring for groundwater. The BLM has determined that the RMP and EIS adequately addressed protection for water resources, including limitations on surface-disturbing activities near drinking water resources and implementation of BMPs.
Wild and Scenic Rivers	2035-1	Commenters requested that the BLM reconsider the eligibility/suitability of several waterways for inclusion in the National Wild and Scenic River System. Specifically, commenters recommended including a specific segment of Warm Springs Creek due to its Wild and Scenic River (WSR) status for the portion on adjacent USFS land, and segments of the Little Popo Agie and Sweetwater rivers due to their outstanding remarkable values. A commenter also stated that the RMP does not adequately describe other mechanisms in place to protect certain qualities of WSR-eligible segments.	After additional review, the BLM determined Segment 1 of Warm Springs Creek was suitable for inclusion in the National Wild and Scenic River System and revised the Proposed RMP and Final EIS to reflect this change. Extensive mechanisms are in place to protect qualities of WSR-eligible segments, including cultural resource management, and management associated with Congressionally Designated Trails.

Issue	Summary Number	Summary Comment	Summary Response
Wild and Scenic Rivers	2035-2	<p>Commenters requested that the BLM incorporate management prescriptions into the RMP and EIS that would limit adverse impacts to Outstandingly Remarkable Values for all eligible and suitable river segments, including, but not limited to, the following: manage certain segments as VRM Class I and II; manage mineral and realty actions within ¼ mile of a segment with category 6 restrictions; let mineral leases within ¼ mile of segments expire; prohibit or mitigate water impoundments, diversions, or hydroelectric power facilities in river segments; close segments to motorized and mechanized vehicles; close timber harvest within river corridors; and intensive management of livestock grazing within river corridors. Commenters also requested that the BLM clarify if the nine segments will be managed to protect their Outstandingly Remarkable Values (as under Alternative A) under Alternative D, independent of recommendations to Congress.</p>	<p>The BLM updated the Proposed RMP and Final EIS to incorporate some of the recommended prescriptions. Other management prescriptions are effectively covered under the Proposed RMP or will be addressed during implementation. During the RMP process, the BLM decides if Outstandingly Remarkable Values meet eligibility and suitability criteria for potential congressional WSR designations. Waterways found to meet the suitability criteria receive protective management until such time Congress decides whether to designate the waterway. Waterways deemed eligible but not suitable are removed from further consideration for protection under the WSR program. This does not preclude these waterways from protections to support other programs, such as recreation, cultural and visual resources, and wildlife. The difference between the alternatives in relation to eligible waterways not deemed suitable is included in the WSR section in Chapter 4.</p>
Wild Horses	2036-1	<p>Commenters stated that the Draft RMP and EIS does not adequately assess the impacts of proposed management on wild horses in the planning area, that the existing conditions of Herd Areas (HAs) and Herd Management Areas (HMAs) are not adequately described, and that the BLM did not complete their analysis with current monitoring data or supporting scientific research.</p>	<p>The BLM reviewed all parts of the document associated with the wild horses analysis and determined the information, as stated, is valid. Management associated with wild horses is based on BLM Manual 4700, and the Proposed RMP and Final EIS complies with measures described in the manual. The BLM collects monitoring information in the planning area HAs and HMAs, including horse herd inventory, observations, use of riparian-wetland areas, livestock use, and precipitation, and the BLM used the information in the analysis.</p>
Wild Horses	2036-2	<p>Commenters expressed concern about the adequacy of proposed management practices for wild horses in the planning area. Specifically, commenters questioned the effectiveness of proposed management methods for addressing genetic viability and health, gather activities, and actions for meeting established population numbers. Commenters requested revisions and additional details on how the BLM will implement BMPs for the maintenance, monitoring, and management of extant wild horse populations, offered suggestions for improved wild horse viewing opportunities and reduced viewing opportunities, and requested the option for converting portions of AUMs allotted for livestock use to wild horses/herds.</p> <p>Commenters provided recommendations on management of wild horses that would both expand and alter management for</p>	<p>Management associated with wild horses is based on BLM Manual 4700. The BLM made technical edits and revised management actions in Chapter 2 for clarity, and added Appendix V (p. 1805), which includes detailed information on wild horse management practices, implementation of BMPs, and recreation opportunities associated with wild horses.</p> <p>The appropriate management levels in the planning area were established in 1993 and 1994. The BLM believes that the appropriate management levels are satisfactory for the current HMAs within its jurisdiction; moreover, the appropriate management levels were established in the Consent Decree, which is still in effect and has been made available on the project website.</p>

Issue	Summary Number	Summary Comment	Summary Response
		wild horse herds and ranges, including increasing appropriate management levels.	
Wilderness Characteristics	2037-1	<p>Commenters expressed confusion regarding guidance on lands with wilderness characteristics and stated the BLM did not provide justification for managing areas as non-Wilderness Study Area (WSA) lands with wilderness characteristics. Regarding management of these areas, multiple commenters recommended prohibiting or limiting motorized travel in lands with wilderness characteristics, while other commenters recommended managing them as ROW exclusion areas in an effort to protect primitive values. Commenters also suggested increasing the size of areas or removing areas with wilderness characteristics under Alternative D. In addition, commenters expressed a need for further inventories of resources in lands with wilderness characteristics to determine how impacts should be managed, with inventories completed using guidance found in IM 2011-154.</p>	<p>The BLM will manage non-WSA lands with wilderness characteristics as authorized by IM 2011-154. The BLM's inventory of lands with wilderness characteristics fully complies with this IM, and provides adequate rationale for the BLM's proposed management of non-WSA lands with wilderness characteristics.</p> <p>The BLM will evaluate closing or limiting motorized travel in specific areas during travel management implementation planning. However, the BLM updated the Travel Management section to include additional protections for the Greer Peak and Lysite mountain regions.</p>
Wilderness Study Areas	2038-1	<p>Commenters questioned if WSAs near populated areas or containing roads should remain designated as WSAs, while other commenters indicated WSAs should be expanded as recommended in the 1994 citizens' recommended wilderness report. One commenter noted the BLM did not identify or recommend any new areas for wilderness protection in Wyoming.</p> <p>Multiple commenters recommended closing or limiting motorized and mechanized travel in WSAs. In addition, commenters indicated a need for further inventories of resources in WSAs to determine how impacts should be managed, specifically in riparian zones. Other comments included requests to withdraw WSAs from mineral entry and imposing Category 5 restrictions in WSAs to protect wildlife. One commenter recommended the BLM not manage WSAs according to WSA management policy, in the event Congress releases those lands for multiple use management.</p>	<p>The BLM does not have the authority to adjust or make changes to existing WSAs.</p> <p>The BLM manages WSAs under BLM Manual 6330, <i>Management of Wilderness Study Areas</i>. The BLM concluded that if motorized use is found to conflict with wilderness values, that route will be closed or the impacts mitigated. Therefore, no route will be found to be non-conforming to the wilderness values. In addition, mechanized use is not prohibited by BLM Manual 6330, and there have been no documented cases where mechanized use is conflicting with wilderness values. If this does occur, the BLM will use implementation planning to address these conflicting uses.</p>
Wildlife	2039-1	<p>Commenters raised several concerns about the BLM's management of wildlife resources and identified information gaps in the wildlife analysis. Specifically commenters raised concerns regarding (1) the impacts of wildlife protections and seasonal restrictions on other resources and energy</p>	<p>The BLM updated wildlife management in the alternatives and other wildlife-related text in the Proposed RMP and Final EIS in response to the comments. Specifically, the BLM updated management actions in Chapter 2, clarified terminology, clearly identified areas open and closed to leasing under each</p>

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		<p>developments, (2) clarification on protective stipulations and annual timing of stipulations, and (3) whether BLM management actions are supported by field verified and/or cited scientific reference documents. In addition, commenters requested additional detailed information regarding management in special habitat designations, protection of big game species and crucial winter ranges, grazing restrictions in wildlife areas, and impacts on amphibian and raptor species. Commenters also identified outdated data presented on wildlife maps.</p>	<p>alternative, added scientific references and citations to support the analysis, and made other revisions, as appropriate. The agency revised Chapters 3 and 4 to clarify wildlife habitat ranges and designations, impacts, and protections.</p> <p>The maps presented in the Draft RMP and EIS are representative of data available at the time they were prepared. The BLM will obtain updated survey information for raptor nests once a federal action is authorized. The agency has updated the maps in the Proposed RMP and Final EIS to reflect recently updated data for big game winter range and greater sage-grouse leks.</p>

### **X.4.3. Non-Substantive Comments**

In addition to the substantive comments summarized and responded to above, the BLM received numerous non-substantive comments during the public comment period. In accordance with BLM NEPA Handbook (H-1790-1), a formal response to non-substantive comments is not required; however, the BLM has reviewed and acknowledges all comments it received. Non-substantive comments generally included:

- Comments in favor of or against management alternatives and allocations without reasoning that meet the criteria for substantive comments (e.g., we disagree with the Preferred Alternative and believe the BLM should select Alternative C)
- Comments that only agreed or disagreed with BLM policy or resource decisions without justification or supporting data that meet the criteria for substantive comments (e.g., the BLM needs to better manage oil and gas development in the planning area)
- Comments that did not pertain to the Lander Field Office planning area
- Comments that were outside the scope of analysis for the RMP and EIS (such as comments related to revision and update of laws, policies, and regulations)
- Comments that took the form of vague, open-ended questions or statements that did not meet the criteria for substantive comments

### **X.5. Conclusion**

The BLM revised the Draft RMP and EIS and prepared the Proposed RMP and Final EIS in response to substantive public comments received during the public comment period. The BLM will continue to consider public, agency, and other stakeholder comments through completion of the Lander RMP revision, as appropriate.