

Cmt #	Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M ¹	Response / How Resolved (completed by BLM NW CO District)
					Cooperating Agency Comments Received as of 4/22/2013		
1.	General		Martin	FS	General Comment: This document is way too long. It drowns the reader in effusive detail, preventing effective review, and could make us vulnerable to protest based on length and complexity alone. It is most certainly not written at the 8 th grade reading level which is what we should be striving for. Focus on conclusions and avoid encyclopedic dissertations.	R	Comment with no suggested solution.
2.	General		Skorkowsky	FS	I realize the USFS is a very small player in this EIS – but the text often refers to BLM lands or the BLM with it also needs to include “and USFS”. Applies throughout most of the sections not specific to BLM or to the USFS.	M	EMPSi has been asked to insert annotation for the FS throughout the document – Bridget and I have also made this change wherever we have encountered it in the document.
3.	General		Skorkowsky	FS	I am wondering if in the intro or another logical place we should mention why other National Forests in the analysis area are not included in the plan amendment?? Or perhaps this would confuse things? This includes: White River, Arapaho-Roosevelt and Grand Mesa, Uncompraghre and Gunnison (GMUG).	R	Comment/Question with no suggested solution.
4.	General		Skorkowsky	FS	Throughout the EIS the text the UF Forest Service is referred to as the Forest Service while the BLM is referred to as the BLM. To be using acronyms consistently – may want to consider referring to the Forest Service as the USFS. This is a minor comment that I don’t feel strongly about.	A	EMPSi/Angie, please complete this global change if you are able in the time allotted.

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5.	General		Griffin, Petch, Warren	CPW	CPW recognizes that BLM is preparing the GRSG Programmatic RMP/EIS in a standard Land Use Planning RMP format; the format is standard in that the resources programs are analyzed and impacts are formatted in the multi resource, multiple-use format where all resources programs are described without resource prioritization. The RMP/EIS is an extensive, complex document; it would be beneficial for ease of public understanding, and for benefit of the U.S. Fish and Wildlife Service if the BLM summarize/distill the benefits to GRSG, by program, in Chapter 4. Page 4-63 would be an appropriate location in the document to create such a summary.	M	The BLM will add a table in Chapter 4 that synthesizes the impacts to GRSG. At the end of this process, the BLM is intending to prepare a "Landscape Level" document that distills down for FWS exactly what the decisions/regulatory mechanisms for grouse protection are across the entire range of the species.
6.	General	All	Griffin	CPW	BLM will need to include somewhere (don't know the best place) a descriptions of plans and tools for tracking all aspects of the disturbance caps. Will each Field Office have their own database? If so, how will these be managed and shared between Field Offices? It would help the reader/user to have a clear indication of where the tracking information will be found. Also, CPW requests that BLM include a paragraph or two to describe the disturbance tracking mechanism and how it will work between BLM FO's.	M	The BLM has developed language, found in Chapter 2, that describes how the caps would be tracked.
7.	General	All	Griffin	CPW	CPW would like to know how the BLM will deal with the disturbance caps when the zone falls within 2 separate Field Offices? CPW recommends that BLM explain the process for tracking when the split FO situation arises.	M	The BLM has developed language, found in chapter 2, that describes how the caps would be tracked.
8.	General	Chapter 2 or Appendix E	Terry Ireland	USFWS	EIS needs to have explanation of how BLM/USFS will track impacts for either 3 or 5% disturbance caps within Colorado management zones in the EIS or across BLM Resource Area if a zone is in more than one Resource Area.	M	The BLM has developed language, found in chapter 2, that describes how the caps would be tracked.

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9.	General	All Skorkowsky comments	Skorkowsky	FS	Key to Skorkowsky's comments highlighting: Existing text Yellow highlight = insert Red highlight = strike		
10.	General	Throughout	Griffin	CPW	As written there are no Timing Limitations or CSUs in General Habitat (PGH) under Alternatives B. CPW does not believe this was the intent of the NTT report. The NTT report states (Pg 5, last paragraph) ... "The conservation measures described in this report are not an end point but, rather, a starting point to be used in the BLM's planning processes. Due to time constraints, they are focused primarily on priority sage grouse habitat areas. General habitat conservation areas were not thoroughly discussed or vetted through the NTT, and the concept of connectivity between priority sage-grouse habitat areas will need more development through the BLM planning process." CPW believes NSO, TL, and CSU should apply to active leks in PGH.	A	Clarification added - TLs and NSO should be attached to active leks in ADH.
11.	General	Throughout	Griffin, Petch, Warren	CPW	CPW did not see anywhere in the document where oil and gas leasing stipulations for areas outside of PPH habitat were described or applicable (nothing mentioned for ADH/PGH). CPW assumes that each BLM FO current RMP stipulations apply to ADH/PGH. If so BLM should make this clear so that the reader will be clear on who and how stipulations will be applied.	M	The BLM is working on a Stipulations Appendix that will discuss each exception criteria in-depth.
12.	Global	Xii, I-I, I-2, etc.	Griffin	CPW	WAFWA is incorrectly abbreviated as WAFFWA in many places throughout the document and appendices, please correct as necessary.	A	Angie/EMPSi, please make sure that WAFWA is abbreviated correctly.
13.	Cover		Skorkowsky	FS	Add USFS logo?	A	Angie/EMPSi, please add USFS logo to the front cover of the document.

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14.	Abstract	08	Skorkowsky	FS	Replace: and one national forest (Routt) that span With: and the Routt National Forest. The analysis area spans .. Comment the same for letter page 4 pp 3	A	Change made.
15.	Abstract	16	Skorkowsky	FS	and is the BLM's and USFS's preferred Actually we need to discuss this with Phil Cruz – there has not yet been that local decision with the USFS. I believe that there was a decision at the last Boise meeting that outlined the process for ID of preferred alternative.	M	Added language that Alt D is the preferred alt – if FS would like this language changed, need to know ASAP.
16.	Dear Reader		Skorkowsky	FS	Should we add steamboat USFS office, Laramie Office or USFS Regional Office as locations to view print copy?	A	Angie/EMPSi, please add these locations to Dear Reader Letter.
17.	xiii	04	Griffin	CPW	The definition of ADH needs to be more specific by including the terms Preliminary Priority Habitat, Preliminary General Habitat and linkage zone.	R	? couldn't find.
18.	ES-002	30 and 34	Griffin	CPW	There is no discussion as to why the Priority Habitat and General Habitats are designated as "Preliminary" that is PPH and PGH. Is there a process by which the BLM will consider them simply Priority and General Habitat, that is PH and GH? This needs to be clarified.	A	Change made – added clarifying language that PPH and PGH would be referred to as PH and GH when a decision is made on this document.
19.	ES-002 to ES-004	Executive Summary	Griffin	CPW	There needs to be a paragraph on the ability of BLM to up-date/revise the Priority Habitat map; Figure ESI. Also, Appendix A pgl, the last paragraph, has language about changing the maps but this IM expires 9/30/2013 and so the language needs to be brought forward and clarified as to the process of how maps can be revised.	A	Agree that this discussion needs to be added, but will add it to Chapter I.

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20.	ES-005	01	Skorkowsky	FS	General comment about issues: It seems like we should present on the issues related to sage grouse decline as a first step and then get into the issues from scoping as a next step. Issues may not be the best place for this - perhaps in the purpose and need section of the ES, add a section on issues affecting SG that the amendment should work to resolve.	M	The BLM is adding a table to the EIS that will synthesize the impacts to GRSG.
21.	ES-005	31	Skorkowsky	FS	BLM-administered lands within the Northwest Colorado District and on the Routt National Forest.	A	Added USFS.
22.	ES-011	27-29	Skorkowsky	FS	Replace last sentence with: Their purpose is to add adequate regulatory mechanisms for the conservation of greater sage grouse in the planning area while also responding to planning issues and concerns identified through public scoping.	M	Added language regarding providing adequate regulatory mechanisms.
23.	ES-011	34	Skorkowsky	FS	alternatives are focused on mapped sage grouse habitat (PPH and PGH)	A	Change made.
24.	ES-011	36	Skorkowsky	FS	Recommend adding a new last sentence: The current delineations of sage grouse habitat may be refined in the future in collaboration with Colorado Parks and Wildlife, USFS and the US Fish and Wildlife Service as additional information is gained and data refined regarding sage grouse habitats and habitat use.	A	Change made.
25.	ES-013	15	Skorkowsky	FS	BLM	A	Change made.
26.	ES-013	16	Skorkowsky	FS	BLM and USFS	A	Change made.
27.	ES-013	40	Skorkowsky	FS	allocate limited resources (unclear what this means).	A	Deleted "limited."
28.	ES-013	41-42	Skorkowsky	FS	Strike: natural resource values and replace with greater sage grouse	M	Added ", including GRSG and their habitat."
29.	I-002		Skorkowsky	FS	1-2 should be 1-5	R	? Couldn't find.
30.	I-002	19	Martin	FS	The acronym WAFWA has an extra 'F' in it (WAFFWA)	A	EMPSi/Angie, please make sure this typo is corrected globally.
31.	I-002	25	Martin	FS	The acronym CPW is used without being written out first (e.g., Colorado Parks and Wildlife)	A	EMPSi/Angie, please make sure this is corrected globally.
32.	I-002	29	Martin	FS	The acronym WAFWA has an extra 'F' in it (WAFFWA)	A	EMPSi/Angie, please make sure this typo is corrected globally.

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33.	I-002	Table I-I	Martin	FS	Table I-I: The 20,049 Forest Service figure must include the White River and AR National Forests; our figures show 17,354. This 'error' is reflected throughout the document.	R	The AR and WR Forests are included for analysis purposes – R. Skorkowsky is working on language to incorporate that explains why they are included in the analysis, but no decision will be made on those lands.
34.	I-002 (6)	Table I-I	Skorkowsky	FS	I believe these numbers include all NFS lands in the planning area and not just Routt National Forest land. I assume this is the intent, but wanted to check.	A	Yes, that was the intent.
35.	I-003	03-07	Skorkowsky	FS	The way this sentence is worded may lead to assumption that GSG hab on the white River national forest is included. Replace with: NSF with Routt National Forest	M	Robert to supplied language clarifying the included habitat on NFS lands. Language to be added. *change to be completed
36.	I-004	09-10	Skorkowsky	FS	Delete last sentence (not correct and unnecessary) "The Routt National Forest contains very little acreage of habitat, and all of it is PGH."	A	Change made.
37.	I-004	10	Martin	FS	This sentence indicates that all of the GRSg habitat on the Routt NF is PGH, when Table I-3 depicts 3,209 acres in PPH	A	Change made – sentence deleted.
38.	I-004	11-12	Skorkowsky	FS	Replace "respective state wildlife agencies" with "Colorado Parks and Wildlife and the USFS" (was FWS included in this?)	R	This section refers to how the BLM as a whole identified GRSg habitat across the range.
39.	I-004	29	Skorkowsky	FS	Recommend adding a new last sentence: The current delineations of sage grouse habitat may be refined in the future in collaboration with Colorado Parks and Wildlife, USFS and the US Fish and Wildlife Service as additional information is gained and data refined regarding sage grouse habitats and habitat use.	A	Change made.

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40.	1-004?	13 and 17	Griffin	CPW	There is no discussion as to why the Priority Habitat and General Habitats are designated as "Preliminary" that is PPH and PGH. Is there a process by which the BLM will consider them simply Priority and General Habitat, that is PH and GH? This needs to be clarified.	A	Change made – added clarifying language.
41.	1-004?	Chapter 1	Griffin, Petch, Warren	CPW	The page numbering is messed up in Chapter 1, as there are numerous pages 1-4.	A	EMPSi/Angie – Please make sure page numbers are sequential.
42.	1-005	09	Martin	FS	While providing interesting information, this section should be shortened - provide basic habitat/population information, but not every detail (e.g., suggest deleting lines 11 – 41 on p. 1-6; lines 1-42 on p. 1-7; and lines 1 – 2 on p. 1-8: this is unnecessary detail)	M	Some information deleted.
43.	1-005	13	Skorkowsky	FS	1,669,669 is not approximate it is exact – use approx. 1,670,000, or delete approximate.	A	Change made.
44.	1-005	15-16	Skorkowsky	FS	Replace “and one national forest 16 (Routt)” with “and the Routt National Forest”	A	Change made.
45.	1-005	16-17	Martin	FS	Number Rule: use numbers for numbers 10 or greater; write word for numbers less than 10 (e.g., thirteen should be 13; 7 should be seven).	A	Angie/EMPSi – please make sure numbers are written correctly.
46.	1-005	26	Skorkowsky	FS	Replace 9000 with 11,000	?	Couldn't find.
47.	1-005	29	Martin	FS	5 should be five	A	Angie/EMPSi – please make sure numbers are written correctly.
48.	1-005	31-35	Skorkowsky	FS	Don't apply in this sentence the decision to the acres “approx. acres” apply it to the RMPs identified on 1-3 lines 17-27. The acres will change – the mapping will change – apply the decision to mapped GSG habitat within the RMPs and subsurface BLM.	M	Angie/EMPSi, please round all acres to the nearest 100 – also remove/add “approximately” if appropriate.
49.	1-005	33	Martin	FS	1 should be one	A	Angie/EMPSi – please make sure numbers are written correctly.
50.	1-005	36	Skorkowsky	FS	Replace “National Forest System Lands” with Routt National Forest lands. This is needed because of the other NFS lands in the project analysis area (white river – that has GSG hab).	A	Angie/EMPSi – please make this change in sentences where we are referring to the Decision Area.

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51.	I-006	24	Martin	FS	6 should be six	A	Angie/EMPSi – please make sure numbers are written correctly.
52.	I-006	26	Martin	FS	2 should be two	A	Angie/EMPSi – please make sure numbers are written correctly.
53.	I-009	28	Skorkowsky	FS	<p>Following this section add a section on the Routt National Forest as follows:</p> <p>Routt National Forest On the Routt National Forest, sage grouse habitat is largely peripheral and represents extensions of sage grouse habitat occurring predominately on lower elevational lands not administered by the US Forest Service. Greater Sage Grouse habitat on the Routt National Forest occurs in management zones 7, 11, 13 & 14, with the majority of habitat occurring in the California Park and Slater Park areas north of Hayden in management zone 7. The Slater Park area has one historic sage grouse lek, which has not been utilized for over 10 years. There are no other active or inactive sage grouse leks on the Routt National Forest.</p>	A	Change made – language added.
54.	I-009	29	Martin	FS	There is no description for the Routt National Forest in this section – 1.3 Description of the Greater Sage-Grouse Planning Area.	A	Change made – added Robert's language.
55.	I-009	29	Skorkowsky	FS	Comment: Are these major land uses on federal lands or all lands within the planning area? It says planning area – but reads as if it is focused on land use on the BLM. How were these determined, is there a citation and any priority to the order?	M	Added clarifying language that these uses occur on public and private lands.
56.	I-010	01	Martin	FS	This section provides unnecessary detail; succinctly describe each planning process in a paragraph or two.	R	Comment with no suggested solution.

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57.	1-015	14-16	Skorkowsky	FS	Delete last sentence and replace with: "An amendment to the Routt National Forest Plan to include direction for greater sage grouse conservation is anticipated to be a non-significant amendment to the Plan."	A	Change made.
58.	1-015	37	Skorkowsky	FS	Delete 'excellent'	A	Change made.
59.	1-017	04	Martin	FS	Suggestion – move the list of specific planning criteria to an appendix to shorten section; perhaps also provide a web link to the appendix. Add a couple of sentences at the end of the first full paragraph to highlight important information (e.g., "Planning criteria include, but are not limited to, requiring compliance with law, regulation, and policy; recognizing valid existing rights; and requiring use of a collaborative and multi-jurisdictional planning approach. A full list of planning criteria used for this analysis may be found in Appendix *").	R	Need to include Planning Criteria in Chapter I so that we are consistent with other planning efforts.
60.	2-001	12-13	Martin	FS	These numbers seem way too low, particularly when looking at PPH and PGH acreages listed in Table 1-3 on p. 1-4.	A	Change made.
61.	2-001	12-13	Skorkowsky	FS	Acre numbers seem wrong	A	Change made.
62.	2-001	16	Martin	FS	This last sentence needs to include the Routt National Forest. The whole section is BLM-centric.	A	Change made.
63.	2-002 (74)	04	Martin	FS	I believe that this is an incorrect heading. It should read LUPA Alternatives instead of RMPA Alternatives to include the Forest Service. Per p. 1-1, lines 13- 14, "These two agencies' plans will be generically referred to as LUPs throughout the remainder of this document".	A	Change made – deleted "RMPA".

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64.	2-002 (74)	31-38	Fred Jarman	Garfield County	Garfield County Plan as an alternative for the area within the political boundaries of the county meets all five of the alternative goals identified: (1) Addresses the identified major planning issues, (2) explores opportunities to enhance management of resources and resource uses, (however, Garfield County plan goes further here by providing for immediate updates and changes to the conservation measures instead of at the end of a five year review period), (3) resolve conflicts among resources and resource uses, (4) meets the purpose of and need for the RMP and RMPA, and (5) is feasible.	R	The Garfield County Plan is included in the document as an Appendix.
65.	2-002 (75)	07	Martin	FS	Section 2.3 is BLM-centric	A	Change made.
66.	2-002 (75)	38-39	Martin	FS	Include Forest Service NFMA requirements in bulleted list	A	Change made.
67.	2-002 (76)	05	Martin	FS	Section 2.4 is BLM-centric	A	Change made.
68.	2-002 (84)	Table 2-2 Coal	Skorkowsky	FS	Should second surface mining be subsurface?	M	No – the action refers strictly to surface mining. Added clarification.
69.	2-003 (83)	24-25	Skorkowsky	FS	RE: “exclusive responsibility” Incorrect: the USFS needs to participate in this process. See decisions from Boise meeting.	A	Change made – added USFS.
70.	2-003 (83)	25	Martin	FS	This sentence should include the FS (designation of preferred alternative...)	A	Change made.
71.	2-003 (83)	37	Skorkowsky	FS	“life of the RMP” - what happens if the amendment is completed in 2014 and the ongoing BLM RMP revisions complete in 2015?	R	Comment with no suggested solution.

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72.	2-004 (79)	02, 12, 22	Martin	FS	Section 2.4.2 – Alternative B (Line 2): At the end of the Alt B description, include a statement about the 3% disturbance cap; Section 2.4.3 – Alternative C (line 12): At the end of the Alt C description, include a statement about the 3% disturbance cap; Section 2.4.4 – Alternative D (line 22): Immediately before the sentence, “Additional information on disturbance cap management...”, include a statement about the 5% disturbance cap for Alt D. Then continue on with the “Additional information” part.	A	Change made.
73.	2-006	37	Martin	FS	Page numbering is off starting with next page; goes back to 2-2 instead of 2-7	A	Angie/EMPSi, please make sure pages are numbered sequentially.
74.	2-009	Table 2-2	Martin	FS	Include a row to display what type of habitat is affected by each alternative (e.g., Alternative B: PPH; Alternative C: PPH, PPG, and Linkage, etc.)	R	
75.	2-010	01	Martin	FS	Section 2.8.1: I suggest removing Tables 2-3 and 2-4 from the body of the document and making them an appendix.	R	
76.	2-010	NTT 2	Skorkowsky	FS	Additionally : California Park Road NFSR 150, is seasonally closed for wildlife May 1 – July 1 and areas of designated elk winter range, including those that have PPH or PGH are seasonally closed to motor vehicles from Dec 15-April 15.	A	Change made.
77.	2-010	NTT 3	Skorkowsky	FS	Routt section delete the word ‘both’	A	Change made.
78.	2-011	NTT 4	Skorkowsky	FS	Routt National Forest: No Similar Action	A	Change made.
79.	2-020 to 2-021	NTT 10	Skorkowsky	FS	The Routt plan direction does not seem designed as a similar action to the NTT action	M	Language added per M.Dillon.
80.	2-055	NTT 33	Skorkowsky	FS	I don’t understand the USFS response	R	Comment with no suggested solution.
81.	2-068	NTT 49	Skorkowsky	FS	USFS response is not clear – replace with no similar action	A	Change made.

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82.	2-068	Table 2-3	Martin	FS	Table 2-3: There are numerous problems with this table as evidenced below. The ones identified below highlight just a few of the problems...I quit after a bit and went back to the body of the ADEIS	R	Comment with no suggested solution. Routt NF actions were provided by the NEST Team.
83.	2-068	Table 2-3	Martin	FS	Table 2-3: NTT No. 49 - The Routt NF statement reads, “ Routt National Forest: See above response to #49.” This is #49	M	Change made per Skorkowsky comments.
84.	2-070	Table 2-3	Martin	FS	Table 2-3: NTT No. 51 – this also says to see #49 above...when there is no response in 49	M	Change made per Skorkowsky comments.
85.	2-071	NTT 52	Skorkowsky	FS	Routt National Forest ... replace “See above response to #49.” With “Timing stipulation for Grouse Breeding Complex March 1-June 30”	A	Change made.
86.	2-071	Table 2-3	Martin	FS	Table 2-3 NTT No. 52. Same problem as above.	M	Change made per Skorkowsky comments.
87.	2-072	NTT 55	Skorkowsky	FS	??? “ Routt National Forest: See above response to #48”. – need to fix to cite what should be said for this element.	A	Change made.
88.	2-072	NTT 56	Skorkowsky	FS	??? “ Routt National Forest: See above response to #48”. – need to fix to cite what should be said for this element.	A	Change made.
89.	2-072	Table 2-3	Martin	FS	Table 2-3 NTT No. 54. The Routt National Forest statement reads, “ Routt National Forest: See above response to #48.” However, there is no entry for the RNF for NTT No. 48 (p. 2-67)	M	Change made per Skorkowsky comments.
90.	2-072	Table 2-3	Martin	FS	Table 2-3 NTT No. 55. Same problem as above	M	Change made per Skorkowsky comments.
91.	2-072	Table 2-3	Martin	FS	Table 2-3 NTT No. 56. Same problem as above	M	Change made per Skorkowsky comments.
92.	2-082	NTT 64	Skorkowsky	FS	??? “ Routt National Forest: See above response to #67.” - need to fix, tacking to #67 does not make sense – numbering is off.	A	Change made.
93.	2-089 to 2-090	NTT 75	Skorkowsky	FS	No similar action is listed and there is an example of direction. I think No similar action is more appropriate as the other direction is very general.	A	Change made.

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94.	2-091 and 2-145	NTT 76	Griffin	CPW	Alt. B states "Apply appropriate seasonal restrictions...". Please reference or define "appropriate restrictions". CPW assumes they are the same as Table 2-6. It would be helpful to clarify the statement.	M	The BLM is developing a Stips Appendix that will discuss each stip in detail – this will be included in the DEIS for public review.
95.	2-100	NTT 87	Skorkowsky	FS	Replace no similar action with “ Routt National Forest : Use genetically local (at the sub-section level), native plant species for revegetation efforts where technically and economically feasible. Use weed-free seed mixtures. While native perennials are becoming established, nonnative annuals or sterile perennial species may be used to prevent soil erosion (Biological Diversity Standard p.1-8).”	A	Change made.
96.	2-106	02 Table 2-4	Terry Ireland	USFWS	Alternative B language, which includes evaluating the need for permanent road closures, should be included for this issue for all designated habitat (ADH).	R	Alternative D includes the action of identifying seasonal closure areas in ADH.
97.	2-107	05 Table 2-4	Terry Ireland	USFWS	A justification for raising the anthropogenic disturbance cap limit to 5% in PPH needs to be inserted up front before Table 2-4 or at the beginning of discussion of Alternative D.	M	*add language to description of alternatives explaining how 5% was derived. *change to be completed
98.	2-107	06	Terry Ireland	USFWS	We recommend selecting language in Alternative C including application to ADH rather than only Priority habitat (P).	R	Comment with no suggested solution. Recommendation is within the range of alternatives.

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99.	2-109	NTT 10 Table 2-4	Creed Clayton	USFWS	The "COT report" (Service 2013) recommends that new infrastructure (e.g., transmission lines, etc.) should not be placed in GRSG habitat. If avoidance is not possible, "habitat function from placement of infrastructure should be replaced" (Service 2013, p. 51). The Report also states that impacts from the development of infrastructure should be "mitigated" (Service 2013, p. 52). It is our understanding that loss of GRSG habitat, even within a designated utility corridor, will need to be mitigated to the point that the project would be "neutral to sage-grouse," as stated in the draft EIS p. (E-6). For clarification, we recommend that the Exception criterion involving the transmission corridor clearly state that effects to GRSG habitat will still need to be properly mitigated.	M	The BLM is developing a Stips Appendix that will discuss each stip in detail – this will be included in the DEIS for public review. Corridor is no longer included in the DEIS.
100.	2-110	NTT 10 Table 2-4	Creed Clayton	USFWS	For clarification, we recommend adding a statement approximating the following underlined text to Alternative D: Disturbance Exception Criteria: Where data-based documentation is available to warrant a conclusion that GRSG populations in the applicable Colorado GRSG Management Zone are healthy and stable at objective levels or increasing, and that the development will not adversely affect GRSG populations due to habitat loss or disruptive activities, the authorized officer may authorize disturbance in excess of the 5% disturbance cap without requiring additional mitigation <u>(i.e., above and beyond the mitigation necessary to ensure that the project remains neutral to sage-grouse).</u>	A	Change made.

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101.	2-111	NTT 11 Table 2-4	Creed Clayton	USFWS	It appears that perch-deterrents would be required for overhead facilities (e.g., transmission lines), should any be granted in GRSG habitat where avoidance is not possible. In addition to perch deterrents, we recommend that non-lattice towers be required in order to reduce the likelihood that these structures would be used for perching or nesting by raptors.	M	The BLM is developing a Stips Appendix that will discuss each stip in detail – this will be included in the DEIS for public review.
102.	2-112	NTT 16 Table 2-4	Creed Clayton	USFWS	Under Alt D we recommend adding something to this effect: “Identify key GRSG habitats on private or state land, adjacent to existing BLM land, where acquisition and protection by BLM could substantially benefit the local GRSG population. This could be accomplished via purchase, exchange, or donation to satisfy mitigation requirements.”	A	Change made.
103.	2-113	NTT 18b Table 2-4	Creed Clayton	USFWS	We recommend that wind farms not be authorized in PPH in the preferred Alternative. The COT report recommends that energy development (both renewable and non-renewable) avoid priority areas for conservation (Service 2013, p. 43). Exception criteria could allow for projects that are designed and mitigated to be neutral to GRSG. We are unaware of any past or current wind farm proposals within PPH in Colorado, so perhaps this recommendation is not critical, but may be relevant in the future.	M	The suggestion is within the range of alternatives for wind energy and for ROW authorizations.

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104.	2-114	NTT 18d Table 2-4	Creed Clayton	USFWS	We recommend that industrial solar projects not be authorized in PPH in the preferred Alternative. The COT report recommends that energy development (both renewable and non-renewable) avoid priority areas for conservation (Service 2013, p. 43). Exception criteria could allow for projects that are designed and mitigated to be neutral to GRSG. We are unaware of any past or current industrial solar project proposals within PPH in Colorado, so perhaps this recommendation is not critical, but may be relevant in the future.	M	The suggestion is within the range of alternatives for solar and for ROW authorizations. The Solar Energy PEIS precludes siting of solar energy greater than 20MW in NW CO.
105.	2-116	24	Terry Ireland	USFWS	We recommend using language in Alternative B.	R	Comment is unclear.
106.	2-116	25	Terry Ireland	USFWS	We recommend using language in Alternative D but change first sentence to read: (ADH) Include terms and conditions on grazing permits and leases that assure habitat meets seasonal sage-grouse habitat requirements and residual forage remains at least at minimum recommended height for hiding cover.	M	Suggested language is within the range of alternatives.
107.	2-117	26	Terry Ireland	USFWS	Use of language in Alternative D is acceptable but at the end of the second sentence add "for sage-grouse".	M	Added "for GRSG habitat objectives."
108.	2-117	28	Terry Ireland	USFWS	We recommend use of Alternative B language but add to it that stubble height must be consistent with summer-fall habitat structure guidance in the 2008 Colorado GRSG Conservation Plan.	M	Suggested language is within the range of the alternatives.
109.	2-118	29	Terry Ireland	USFWS	Alternative D language is acceptable but include that stubble height must be consistent with summer-fall habitat structure guidance in the 2008 Colorado GRSG Conservation Plan.	M	Suggested language is within the range of the alternatives.
110.	2-119	31	Terry Ireland	USFWS	Apply Alternative D to ADH. The last sentence in Alternative C is missing words at the end of the sentence. Check wording in original language for Alternative C. Needs to add words like "development structures".	M	Suggested language is within the range of the alternatives. Added "developments."

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III.	2-120	32	Terry Ireland	USFWS	Apply to ADH under Alternative D. Acreage inside of 150 feet of the edge of irrigated meadows should count against the disturbance cap if vegetation in the meadows was altered and maintained such that it will not provide sage-grouse habitat. If the irrigated meadow consists of native vegetation (i.e. the meadow has only had water applied to it but the native vegetation is still there) and is still consistent with sage-grouse habitat requirements then we agree that none of the irrigated meadow would count towards the disturbance cap.	M	Good ideas for implementation stage of the plan, if Alt D is chosen. The tables included in Appendix E (Disturbance Cap Management) portray an estimate of existing disturbance in each CO Management Zone. At the implementation phase, depending on which alternative is chosen, site-specific inventories of disturbances would be used prior to authorizing any projects.

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112.	2-120	32 Alt D	Griffin, Petch, Warren	CPW	<p>(P – Sagebrush Ecosites) Retain... Sites capable of supporting sagebrush habitat will count against the cap until they have recovered to at least 12 percent canopy cover in Wyoming big sagebrush and 15 percent in mountain big sagebrush dominated areas (Bohne et al., 2007).</p> <p>CPW supports the inclusion of the language as written in this row (and in other occurrences, e.g., Page 2-145, Row 47, Alt D) and believes that it is appropriate for these landscape scale habitat alterations to be charged against the cap until they provide mature sagebrush communities (12-15% canopy cover, as written).</p> <p>Our understanding of BLM's intent is to require large scale and/or "natural" departures from sagebrush communities (agriculture, fire, habitat treatments, mappable weed concentrations, etc.) to be charged against the 70-30 cap until they reach this mature canopy coverage, and for this approach to be different from requirements for small scale anthropogenic developments that would use the less mature reclamation standard in Appendix F. CPW is concerned, however, that the intent to apply these two reclamation standards is not adequately defined and recommends that the intent and rationale for these differences in reclamation standard be more clearly defined in the text, in addition to the Chapter 2 alternative table.</p>	M	Acknowledge the need to tailor the WRFO Reclamation Plan to GRSG EIS disturbance cap management.

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113.	2-120	32 Alt. D	Griffin, Petch, Warren	CPW	<p>CPW is generally concerned for habitat treatments in Greater Sage-grouse habitats. CPW's concerns are that some populations may have one life stage or seasonal habitat that is more limiting than others, but we rarely know which it is (and it may fluctuate over time).</p> <p>Survival during older life stages (juvenile, yearling, adult), nest success, and chick survival are all equally important for long-term population growth in GRSG (Taylor et al. 2011), so in the absence of knowledge which life stage or seasonal habitat is limiting, CPW recommends a balanced approach that maintains all seasonal habitats. They should not just focus on creating brood-rearing habitat, because that typically reduces the amount of winter or nesting habitat.</p> <p>It also depends on what specific treatments, improvements, and restoration BLM may be planning. Removing encroaching Pinon-Juniper would be an appropriate treatment in winter habitat, removing sagebrush would not, etc.</p>	R	<p>Comment concern is captured in the range of alternatives.</p> <p>“On a site by site basis, independent of cap management issues, do not allow treatments with the potential to adversely affect GRSG populations.”</p>
114.	2-121 to 2-122	33 second part	Terry Ireland	USFWS	We recommend revised Alternative C language be adopted as follows: For vegetation treatments in areas with grazing the treatment plan must include pretreatment data on wildlife and habitat condition. A subset of treatments (about 5%) in different sagebrush ecosites must have established grazing exclosures where treated areas are monitored at least 3 years before livestock returns and continue monitoring for at least 5 years after livestock are returned to the area. Compare to treated, ungrazed exclosures, as well as untreated areas.	R	Comment is captured in the range of alternatives.
115.	2-123	35	Terry Ireland	USFWS	Apply to ADH.	R	Comment is unclear.
116.	2-123	36	Terry Ireland	USFWS	Apply to ADH.	R	Comment is unclear.

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117.	2-124	37	Terry Ireland	USFWS	We recommend choosing Alternative C language for ADH. Alternative C language is the most flexible and allows for the possibility of any of the three options; removal, modification, or marking of fences, as feasible or warranted without prioritizing which option should be conducted first.	R	Comment is within the range of alternatives.
118.	2-124	39	Terry Ireland	USFWS	Alternative D language appears acceptable but insert that at least minimum habitat requirements for sage-grouse should be maintained if used as a grass bank. Also, insert language stating that establishment of grazing exclosures and monitoring of habitat within and outside of the exclosures will be conducted to ensure minimum sage-grouse habitat is maintained on the grass bank allotments.	A	Added language “for the benefit of GRSG.”
119.	2-127	46	Griffin, Petch, Warren	CPW	<p>The document states that in unleased fluid minerals (Priority Habitat): it will “Make GRSG habitat areas NSO areas for fluid mineral leasing.”</p> <p>CPW request that BLM make it clear that the NSO would be NW Colorado wide, and that the exception criteria would also be NW Colorado wide - until updated FO RMPs are finalized and signed. It is possible that confusion could occur if individual FOs interpreted that their individual exception criteria could be applied to the NSO. Clarification would be helpful.</p>	M	BLM is currently developing a Stips Appendix that will be included in the Public Draft EIS – this appendix will describe each stip by alternative in detail.

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120.	2-127	46	Griffin, Petch, Warren	CPW	<p>The document reads: "Exception Criteria: Where data-based documentation is available to warrant a conclusion that GRSB populations in the applicable Colorado GRSB Management Zone are healthy and stable at objective levels or increasing, and that the development will not adversely affect GRSB populations due to habitat loss or disruptive activities, the authorized officer may authorize disturbance in excess of the 5% disturbance cap without requiring additional mitigation."</p> <p>CPW is unclear about how large of an area will be given for a development area exemption within the NSO area. Will the entire NSO area be exempted, will just the disturbance foot print be exempted, will it be the disturbance footprint plus some buffer, or will it be something else? Who would determine how large of an area it will be? CPW requests that BLM clarify who determines the area of exemption and what amount of disturbance will be exempted so that it is clear in the document and for the user. It's also essential to know the acreage for tracking purposes.</p>	M	BLM is currently developing a Stips Appendix that will be included in the Public Draft EIS – this appendix will describe each stip by alternative in detail.

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121.	2-127	NTT 46 Table 2-4	Creed Clayton	USFWS	<p>As stated previously, we recommend adding a statement approximating the following underlined text to Alternative D:</p> <p>Exception Criteria: Where data-based documentation is available to warrant a conclusion that GRSG populations in the applicable Colorado GRSG Management Zone are healthy and stable at objective levels or increasing, and that the development will not adversely affect GRSG populations due to habitat loss or disruptive activities, the authorized officer may authorize disturbance in excess of the 5% disturbance cap without requiring additional mitigation <u>(i.e., above and beyond the mitigation necessary to ensure that the project remains neutral to sage-grouse).</u></p> <p>It would also be informative to the public to make a follow-up statement akin to the following for the small, at-risk GRGS populations and/or populations that do not currently have a defined population objective level. We recommend adding something like this:</p> <p>At the time of the development of this EIS, unless conditions improve and/or population objective levels are defined, we do not anticipate granting exceptions to this NSO within those GRSG populations deemed by the COT report to be at high risk (i.e., Eagle-South Routt, Parachute-Piceance-Roan, Meeker-White River).</p>	M	Exception Criteria language added. Protections for the high-risk populations are built into this alternative (Alternative D).

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122.	2-127	NTT 46 Table 2-4	Creed Clayton	USFWS	<p>In addition, we recommend adding a statement under Alternative D that exceptions to the NSO are not expected to be made within 0.6 mile of a lek, regardless of habitat type and regardless of the percent disturbance found within a given zone.</p> <p>Otherwise, we fear that some active leks and nearby nests on BLM land could be at risk from energy development. Through our own GIS analysis, we have found active leks on unleased BLM land or land with unleased Federal minerals where a drilling pad could potentially be constructed extremely close to a lek (< 0.1 mile) in non-sagebrush type habitat. It appears that the only stipulation in the EIS that would prevent this would be non-concurrence from CPW. This may be sufficient, but it would be better if such situations/waivers were clearly precluded in the EIS up front and not subject to a future decision where third-party pressures may come into play.</p>	M	<p>Language added regarding 0.6 miles from an active lek.</p> <p>BLM is currently developing a Stips Appendix that will be included in the Public Draft EIS – this appendix will describe each stip by alternative in detail.</p>

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123.	2-127	NTT 46 Table 2-4	Creed Clayton	USFWS	<p>In order to grant an NSO exception under Alternative D when the disturbance cap has been reached, data-based documentation needs to show that the zone's GRSG populations are healthy, stable, etc. Is this documentation also required to grant an exception if the disturbance cap has not been reached or if the project would not be in sagebrush habitats? Is CPW's concurrence still required? Will the project need to be "GRSG-neutral"? The answers are not perfectly clear in Table 2-4.</p> <p>We recommend that in all cases, regardless of the level of disturbance in a zone or habitat type of the proposed project area, concurrence from CPW be required for an NSO exception. Otherwise, due to the naturally fragmented distribution of sagebrush habitat types in some areas (e.g., PPR), a high density of gas pads could potentially be constructed outside of sagebrush habitat yet surrounding high-value GRSG habitats, without adding to, or being constrained by, the disturbance cap (or any other measure in the EIS).</p>	M	Added language to clarify that CPW concurrence would be required for NSO exceptions. Also added language clarifying that 0.6 mile from lek disturbances would most likely not be permitted.

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124.	2-128		Creed Clayton	USFWS	<p>Under Unleased Fluid Minerals in Table 2-4 there is no protection offered for PGH, which contains numerous leks, including active leks. We recommend adding a stipulation to protect sage-grouse habitat within mapped PGH.</p> <p>At a minimum, we recommend adding the standard 0.6 mile NSO around all known leks, regardless of habitat type, along with a more extensive Timing Limitation around active leks. Otherwise, what measure in the EIS would prevent a well from being drilled right on top of an active lek in PGH? According to our GIS data, this appears to be a real possibility as there are one or more active leks in PGH overlying unleased federal minerals. There are other active leks in PGH very close to unleased BLM land that appear to have no protections from energy development in the EIS.</p>	M	<p>Added these stips to ADH under Alt D:</p> <p>(ADH) make areas 0.6 mile from active leks NSO.</p> <p>(ADH) apply TL to areas 4 miles from active leks.</p>

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125.	2-128	46	Griffin, Petch, Warren	CPW	<p>Allow geophysical operations only using helicopter-portable drilling, wheeled or tracked vehicles on existing roads, or other approved methods conducted in accordance with seasonal timing limitations and other restrictions that may apply.</p> <p>As identified in Chapter 2, page 63, BLM seasonal timing limitations for geophysical operations are as follows: Colorado River RMP, Grand Junction RMP, Kremmling RMP, White River RMP, Routt National Forest: No similar action. Little Snake RMP: RMP-39/2.31. "Using oil and gas stipulations as reference point, restrictions will be determined at the permitting stage on a case by case basis". Roan Plateau RMP: Allow geophysical exploration within priority sage-grouse habitat areas to obtain information for existing Federal fluid mineral leases or areas adjacent to state or fee lands within priority sage-grouse habitat areas. Allow geophysical operations only using helicopter-portable drilling, wheeled or tracked vehicles on existing roads, or other approved methods conducted in accordance with seasonal timing limitations and other restrictions that may apply.</p> <p>Colorado River RMP, Grand Junction RMP, Kremmling RMP, White River RMP, Routt National Forest do not have seasonal timing limitations or other restrictions for geophysical operations. The Roan Plateau RMP does not have mapped Greater sage-grouse habitat and thus not seasonal timing limitation or other restriction.</p> <p>CPW believes the stipulations across NW Colorado are insufficient and they should they be updated to be consistent for all of the BLM FOs.</p>	M	BLM is developing a Stips Appendix that will describe in detail each stip by alternative that will be included in the public version of the DEIS.

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126.	2-128	NTT 46 Table 2-4	Creed Clayton	USFWS	We recommend using the seasonal restriction sentence from Alternative C (Conservation Alt --last sentence) in Alternative D because it is more specific and clear. The Alternative B (NTT) seasonal restrictions are undefined and therefore unclear.	A	Change made.
127.	2-129	46	Griffin, Petch, Warren	CPW	Also in unleased fluid mineral section: (ADH) Where drainage is likely, the BLM may issue new leases with an NSO stipulation with appropriate exception, waiver, and modification criteria. The BLM would consider granting an exception, modification, or waiver to this NSO only after collaboration with the state wildlife agency. Does all designated habitat include priority habitat? If so this line item may not be necessary because of the above line item (#45) in PPH.	A	This mgmt. action applies to PPH to be consistent with mgmt. action regarding NSO above.
128.	2-129	47	Terry Ireland	USFWS	Noise is mentioned in Alternative D as needing to be addressed in surface use operations. We recommend including indirect disturbance buffers for noise impacts into disturbance cap calculations (see Blickley et al. 2012).	R	Impacts from noise are analyzed in Chapter 4.
129.	2-130	NTT 50 Table 2-4	Creed Clayton	USFWS	1) We recommend that all exceptions to the COA outlined for Alternative D be contingent upon concurrence from CPW. Adequacy/effectiveness of mitigation should also be contingent upon concurrence from CPW. 2) We recommend adding a statement under Alternative D that in no case would project activities be allowed during the lekking and nesting seasons within 0.6 mile of a lek.	A	Change made.

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130.	2-131 to 2-132	Exception #3	Griffin, Petch, Warren	CPW	<p>Exception #3 reads: Where data-based documentation is available to warrant a conclusion that GRSG populations in the applicable Colorado GRSG Management Zone are healthy and stable at objective levels or increasing, and that the development will not adversely affect GRSG populations due to habitat loss or disruptive activities, the authorized officer may authorize disturbance in excess of the 5% disturbance cap without requiring additional mitigation. In many cases, this exception will require project proponents to fund studies necessary to secure the “date[a]-based documentation” requirement.</p> <p>CPW requests that BLM track this exempted disturbance (independent of the cap) to help BLM compile and review the bigger picture of ongoing disturbance activities. This tracking will be important as impacts to GRSG lag, time wise, behind actual disturbance and population changes will be seen after several past the actual disturbance.</p>	M	Good information for developing the implementation plan for this document if Alternative D is selected.

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131.	2-132	NTT 51 Table 2-4	Creed Clayton	USFWS	Under Alternative D, disturbances would be capped at 5% (as explained in Appendix E). It does not also restrict, however, the disturbances to 1 per section, as does Alternative B (the NTT Alternative). We recommend incorporating this restriction into Alternative D as well (to the extent existing lease rights could be maintained). For example, Alternative D could allow 4 disturbances on a lease within a section, say 4 drilling pads and associated roads totaling 8 acres each (totaling 5% of a 640-acre section). If these 4 pads (and associated roads) essentially surrounded a lek, even if each were 0.6 mile from a central lek, the lek could be at risk of abandonment over time (Doherty et al. 2010). If deep shale gas is the resource of interest to a lease holder (as is now often the case), current horizontal drilling technology would allow for down-hole targets within a section to be reached from one surface location.	M	Suggested change to Alternative D is within the range of alternatives. Alternative D would not provide an exception to the NSO within 0.6-miles of all active leks.

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132.	2-134	Alts. B,C,D	Griffin, Petch, Warren	CPW	<p>Conduct additional, effective mitigation first within the same population area where the impact is realized, and if not possible then conduct mitigation within the same Management Zone as the impact, per 2006 WAFWA Strategy – pg 2-17.</p> <p>CPW supports this action. However, it is unclear what BLM is expecting or where the BLM is directing the reader or operator to go or do; is it BLMs intent to direct them to Appendix E, Reclamation for mitigation measures?</p> <p>CPW should be included in development of mitigation measures. CPW does not believe that there is a well defined list of effective mitigation actions at this time, and that mitigation effectiveness will become known with more experience and time.</p> <p>CPW's concerns are that some GRSG populations may have one life stage or seasonal habitat that is more limiting than others, but we rarely know which it is (and it may fluctuate over time).</p> <p>Survival during older life stages (juvenile, yearling, adult), nest success, and chick survival are all equally important for long-term population growth in GRSG (Taylor et al. 2011), so in the absence of knowledge which life stage or seasonal habitat is limiting, CPW recommends a balanced approach that maintains all seasonal habitats. They should not just focus on creating brood-rearing habitat, because that typically reduces the amount of winter or nesting habitat.</p> <p>It also depends on what specific treatments, improvements, and restoration BLM may be planning. Removing encroaching Pinon-Juniper would be an appropriate treatment in winter habitat, removing sagebrush would not, etc.</p>	M	Acknowledge the need to tailor the WRFO Reclamation Plan to GRSG EIS disturbance cap management.

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133.	2-135	59	Terry Ireland	USFWS	We recommend using language in Alternative B.	R	Comment is unclear.
134.	2-137	63	Terry Ireland	USFWS	Under Alternative D please explain or use examples of what unsuitability criteria contain.	R	CFR for where the unsuitability criteria can be found is given.
135.	2-137	63	Griffin, Petch, Warren	CPW	(ADH) New Surface coal mine Leases: Apply the requirements of 43 CFR Subpart 3461 to determine unsuitability. Find unsuitable all surface mining of coal under the criteria set forth in 43 CFR 3461.5 to ensure that the specific Lek instance or reference is adequately addressed. Where practicable, limit permitted disturbances as defined in Appendix E , Alternative D Disturbance Cap Management, to 5% in any Colorado Management Zone. Where disturbance exceeds 5% in any Management Zone make additional, effective mitigation necessary to offset the resulting loss of sage-grouse habitat. CPW recommends that BLM check that 43 CFR... is not in conflict with standards of Appendix E for reclamation standards.	A	Double-checked CFR and it does not appear to be in conflict.
136.	2-137	64	Terry Ireland	USFWS	Alternative D says measure applies to ADH but text says only priority habitat, change text to ADH.	R	Statement is accurate as written.
137.	2-141	65	Terry Ireland	USFWS	We recommend using language in Alternative B if possible under the 1872 Mining Law.	R	Comment is within the range of alternatives.
138.	2-143	69	Terry Ireland	USFWS	Apply to ADH.	R	Comment is unclear.
139.	2-143	70	Terry Ireland	USFWS	Specify that locatable mineral and fluid mineral design features (and potentially other RDF's and PDF's) are to be followed for non-energy leasable minerals under Alternative C and D.	R	This is articulated in Chapter 2.
140.	2-143	71	Terry Ireland	USFWS	Apply to ADH.	R	Comment is unclear.

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141.	2-144	72 Alts. B,C,D	Griffin, Petch, Warren	CPW	(ADH) Restore saleable mineral pits no longer in use to meet GRSG habitat conservation objectives. Require reclamation/restoration of GRSG habitat as a viable long term goal to improve the GRSG habitat. CPW recommends that BLM require use of Appendix E for reclamation actions when the site is within an ecological site capable of producing sage brush at desired conditions.	M	Referred the reader to Appendix E.
142.	2-144	73	Terry Ireland	USFWS	Apply to ADH.	R	Comment is unclear.
143.	2-144	74	Terry Ireland	USFWS	Apply to ADH.	R	Comment is unclear.
144.	2-144	75	Terry Ireland	USFWS	Apply to ADH.	R	Comment is unclear.
145.	2-145	76	Terry Ireland	USFWS	Apply to ADH.	R	Comment is unclear.
146.	2-145	76 Alt. D	Griffin	CPW	(P) Apply appropriate seasonal restrictions for implementing vegetation management treatments according to the type of seasonal habitats present in a management zone. See Table 2-6 , Habitat Timing Limitations by Field Office, and Table 2-7 , Stipulation Description for Nesting Habitat Timing Limitation. How will BLM treat an activity when a FO does not have a seasonal timing restriction? Table 2-6 and 2-7. Will BLM use a Statewide stipulation; Table 2-6 foot note #2?	M	Stips developed through this EIS would supercede existing stips, should one of the action alternatives be chosen in the decision. However, TLs from existing plans could still be chosen if they are within the range of alternatives.
147.	2-145	77	Terry Ireland	USFWS	The measure under Alternative D does not address winter habitat specifically as done so for Alternatives B and C. Clarify how the measure, especially the last bullet, will protect winter habitat.	R	Comment is within the range of alternatives. Alternative D fuels management actions would apply to all habitat, not just winter range.
148.	2-149	ES&R - No row	Terry Ireland	USFWS	(ADH) Insert conservation measure under any alternative to monitor and control invasive weeds for at least 3 years post-burn.	M	Within the range (see alternative A fuels management)
149.	2-151	89	Terry Ireland	USFWS	We recommend using language in Alternative B for first section under row 89.	R	Comment is not clear.

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150.	2-152	Habitat Rest. - No Row	Terry Ireland	USFWS	(ADH) Insert conservation measure under any alternative to monitor and control invasive weeds for at least 3 years post-burn.	R	Within the range (see alternative A fuels management)
151.	2-153	94	Terry Ireland	USFWS	We recommend using language in Alternative B.	R	Comment not clear.
152.	2-153	95	Terry Ireland	USFWS	We recommend inserting specific conservation measure for pinyon/juniper removal. The standard measure in Alternative D only mentions retention of 70% of habitat in native sagebrush community and that PJ will be counted towards the cap if it's mappable.	R	Comment within the range.
153.	2-155	ACECs	Terry Ireland	USFWS	ACEC's may provide conservation value to GRSG. Please describe why there were no ACEC's proposed under Alternative D and the difference between protection of GRSG in ACEC's versus protection of GRSG through other conservation measures.	M	Language has been added throughout the document to clarify why ACECs do not add more protection for GRSG in addition to those outlined throughout the action alternatives.
154.	2-157	Table 2-6	Griffin	CPW	BLM needs to clarify the various scenarios of when revised RMPs are completed before or after this Grouse EIS and under each scenario which TL restrictions apply. For example, If the EIS is signed before the ROD for the revised RMPs does the individual FO TI apply or does the footnote 2 "Statewide" stipulations supersede the various FO stipulations.	M	Stips developed through this EIS would supercede existing stips, should one of the action alternatives be chosen in the decision. However, TLs from existing plans could still be chosen if they are within the range of alternatives.
155.	3-001		Martin	FS	General Comment: All of the existing condition sections go on ad nauseam and there is very little direct tie to GRSG.	R	Comment with no suggested solution.
156.	3-003	25-36	Martin	FS	Delete beginning with, "Conditions for a" on row 25 to end of row 36	R	EMPSi will complete a tech edit of the entire document.
157.	3-004	01	Martin	FS	Delete row I until new sentence starts (For...)	R	EMPSi will complete a tech edit of the entire document.
158.	3-004	14-24	Martin	FS	Delete beginning with, "If there is change" on row 14 to end of row 24; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
159.	3-004	35-44	Martin	FS	Delete beginning with, "Although Colorado..." on row 25 to end of row 44	R	EMPSi will complete a tech edit of the entire document.

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160.	3-005	01-04	Martin	FS	Delete rows 1-4	R	EMPSi will complete a tech edit of the entire document.
161.	3-005	Table 3-1	Martin	FS	Table 3-1: Include 'Greater Sage Grouse' in the list of birds	A	Change made. *change to be completed.
162.	3-006	10-31	Martin	FS	Rewrite first full sentence beginning on row 10 to say, "These features include structure, vertical layers, horizontal zones, complexity, edge and special features." Define terms in glossary. Delete rows 11-31.	A	Change made per Skorkowsky.
163.	3-007	23	Martin	FS	Suggest listing each main wildlife category and including a brief definition of what each means in the context of this analysis. Delete remaining text beginning with line 27 on page 3-7 through row 19 on page 3-9. This is unnecessary detail and will shorten the document.	R	EMPSi will complete a tech edit of the entire document.
164.	3-010	10-15	Martin	FS	Suggest deleting everything after word 'boundaries' on row 10 (i.e. 'mule deer, pronghorn...') to end of row 15.	R	EMPSi will complete a tech edit of the entire document.
165.	3-011	01-12	Martin	FS	Start row 1 with, 'but are not limited to bull/gopher snake (<i>Pituophis catenifer</i>), sagebrush lizard (<i>Sceloporus graciosus</i>), and prairie rattlesnake (<i>Crotalus viridis</i>). Delete rows 2-12.	R	EMPSi will complete a tech edit of the entire document.
166.	3-011	33-38	Martin	FS	Delete beginning with, "Dusky grouse are..." on row 33 to "of the planning area" on row 38	R	EMPSi will complete a tech edit of the entire document.
167.	3-011	39	Martin	FS	Add word "also" before "exist"	R	EMPSi will complete a tech edit of the entire document.
168.	3-012	10-22	Martin	FS	Delete rows 10 – 22; this information is not relevant	R	EMPSi will complete a tech edit of the entire document.
169.	3-012	25-30	Martin	FS	Delete rows 25 – 30; until after citation on row 30	R	EMPSi will complete a tech edit of the entire document.
170.	3-013	03-12	Martin	FS	Delete rows 3 – 12; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
171.	3-013	Table 3-3	Martin	FS	Table 3-3: Number 1025485 is missing commas	R	EMPSi will complete a tech edit of the entire document.

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172.	3-014	07	Martin	FS	Incomplete sentence	R	EMPSi will complete a tech edit of the entire document.
173.	3-015	01-33	Martin	FS	Consider deleting rows 1 - 33. Moose and bighorn sheep aren't part of the three primary big game species, and they aren't depicted in Table 3-3 (p. 3-13)	R	EMPSi will complete a tech edit of the entire document.
174.	3-018	01	Martin	FS	Add the word 'this' before 'section'	R	EMPSi will complete a tech edit of the entire document.
175.	3-018	09-36	Martin	FS	Delete row 9 beginning with, "In selecting the..." to end of row 36. Irrelevant	R	EMPSi will complete a tech edit of the entire document.
176.	3-019	06-16	Martin	FS	Delete row 6 beginning with, "In selecting the..." to end of row 16. Irrelevant.	R	EMPSi will complete a tech edit of the entire document.
177.	3-019	29-43	Martin	FS	Delete rows 29 - 43; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
178.	3-020	01-02	Martin	FS	Delete rows 1 – 2; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
179.	3-021	41-42	Martin	FS	Delete rows 41 – 42; unnecessary detail.	R	EMPSi will complete a tech edit of the entire document.
180.	3-022	01-04	Martin	FS	Delete rows 1 – 4; unnecessary detail.	R	EMPSi will complete a tech edit of the entire document.
181.	3-022	11-22	Martin	FS	Delete beginning with, "These fish occur..." on row 11 to end of row 22. Irrelevant	R	EMPSi will complete a tech edit of the entire document.
182.	3-025	19-28	Martin	FS	Delete rows 19 -28; irrelevant	R	EMPSi will complete a tech edit of the entire document.
183.	3-026	09-33	Martin	FS	Delete beginning with, "Several sources of information..." on row 9 to end of row 33. Irrelevant.	R	EMPSi will complete a tech edit of the entire document.
184.	3-026	34	Martin	FS	Delete word "Other" and begin sentence with "Estimates" This paragraph should follow the Wilson's Warbler heading on row 9	R	EMPSi will complete a tech edit of the entire document.
185.	3-027	05-17	Martin	FS	Delete rows 5 - 17; irrelevant	R	EMPSi will complete a tech edit of the entire document.
186.	3-027	24-42	Martin	FS	Delete beginning with, "Several sources of" on row 24 to end of row 42; irrelevant	R	EMPSi will complete a tech edit of the entire document.

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187.	3-028	01-39	Martin	FS	Delete rows 1 - 39; irrelevant. Information from rows 40 – 43 (over to row 8 on next page) should be moved up to row 24 on p. 3-27 (after CRCT heading)	R	EMPSi will complete a tech edit of the entire document.
188.	3-029	09-29	Martin	FS	Delete beginning with, “Several sources of...” on row 9 to end of row 29; irrelevant	R	EMPSi will complete a tech edit of the entire document.
189.	3-034	04-23	Martin	FS	Delete rows 4 – 23; irrelevant. Start section with information on row 24	R	EMPSi will complete a tech edit of the entire document.
190.	3-036	11	Martin	FS	Number 9 should be ‘nine’	R	EMPSi will complete a tech edit of the entire document.
191.	3-057	05	Martin	FS	Double-check these numbers against Table 1, p. 1-2	R	EMPSi will complete a tech edit of the entire document.
192.	3-058	Table 3-8	Martin	FS	Missing Table 3-8 numbers for RNF include; MZ 7 - 11,729; MZ 11 – 766; MZ 13 - 995; MZ 14- 3,864	A	Change made. *change to be completed.
193.	3-067	26-32	Martin	FS	Delete rows 26 – 32; this has been stated numerous times throughout the document	R	EMPSi will complete a tech edit of the entire document.
194.	3-081	01-07	Martin	FS	Delete rows 1 - 7; irrelevant	R	EMPSi will complete a tech edit of the entire document.
195.	3-081	Table 3-13	Martin	FS	Table 3-13 lists 1,100 acres within City Limits for the Forest Service ??	R	Information is from the BER Report. There is GRSG guidance that we must include data from the BER Report in our document.
196.	3-082	Table 3-14	Martin	FS	Table 3-14 - 600 miles of transmission lines sounds excessive. Carol Tolbert checked our database. (2.2 miles total - ‘greater than 115 KV’; PGH: 1.7 and PPH: 0.5) Please check the source document (Marnier et al.) to see how figures were calculated?	R	Information is from the BER Report. There is GRSG guidance that we must include data from the BER Report in our document.
197.	3-083	08-15	Martin	FS	Delete beginning with, “The FLPMA requires...” on row 8 to end of row 15; irrelevant.	R	EMPSi will complete a tech edit of the entire document.
198.	3-084	01-07	Martin	FS	Delete rows 1 - 7; irrelevant	R	EMPSi will complete a tech edit of the entire document.
199.	3-084	22-27	Martin	FS	Delete beginning with, “In addition, lands” on row 22 to “lands being exchanged” on row 27.	R	EMPSi will complete a tech edit of the entire document.
200.	3-085	14-21	Martin	FS	Delete rows 14 - 21; irrelevant	R	EMPSi will complete a tech edit of the entire document.

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201.	3-088	28-40	Martin	FS	Delete rows 28 - 40; irrelevant	R	EMPSi will complete a tech edit of the entire document.
202.	3-089	02-05	Martin	FS	Delete beginning with, "Most funding for purchases..." on row 2 to "done with land exchanges" on row 5. Irrelevant	R	EMPSi will complete a tech edit of the entire document.
203.	3-089	15-27	Martin	FS	Delete beginning with, "Although established" on row 15 to end of row 27; irrelevant	R	EMPSi will complete a tech edit of the entire document.
204.	3-089	36-43	Martin	FS	Delete beginning with, "For example..." on row 36 to end of row 43; irrelevant.	R	EMPSi will complete a tech edit of the entire document.
205.	3-090	01-10 and Table 3-21	Martin	FS	Delete Rows 1-10 and Table 3-21; irrelevant.	R	EMPSi will complete a tech edit of the entire document.
206.	3-090	13-15	Martin	FS	Delete beginning with, "Permits for the recreation..." on row 13 to end of row 15; irrelevant	R	EMPSi will complete a tech edit of the entire document.
207.	3-091	01-06	Martin	FS	Delete rows 1 - 6; irrelevant	R	EMPSi will complete a tech edit of the entire document.
208.	3-092	09	Martin	FS	Change row 9 to read, "In December 2012, the Forest Service received 124 acres of PGH through a land donation acquisition in California Park (Management Zone 7).	A	Change made per M. Dillon.
209.	3-094	Table 3-22	Martin	FS	Table 3-22: Where does the ADH figure come from? Per Table 1-1, in Chapter 1, there are 3,598,526 acres of PPH and PHG in the planning area. Per Table 2-2, there are 2,523,304 acres of ADH. Which figures are correct??	M	Acreage figures will be checked and re-checked for accuracy.
210.	3-095	24	Martin	FS	The highlighted information is correct.	M	Thank you.
211.	3-098	08-34	Martin	FS	At the end of the first full sentence on row 8, add the following, "These vegetation types include ponderosa pine, lodgepole pine, spruce-fir, and aspen forests." Delete beginning with, "Ponderosa pine forests are..." on row 8 to end of row 34; unnecessary information	R	EMPSi will complete a tech edit of the entire document.
212.	3-100	03-13	Martin	FS	Delete rows 3 – 13; irrelevant	R	EMPSi will complete a tech edit of the entire document.

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213.	3-100	Table 3-24	Martin	FS	Table 3-24: Not sure where the 9,100 acres comes from. Per R. Skorkowsky, ADH acres on the RNF have the potential for cheatgrass.	M	Acreage figures will be checked and re-checked for accuracy.
214.	3-103	Table 3-26	Martin	FS	Table 3-26: These numbers are incorrect; there are only 12,501 acres of PPH and PGH on the RNF (not 20, 048)	M	Acreage figures will be checked and re-checked for accuracy.
215.	3-104	21-35	Martin	FS	Delete rows 21 - 35; irrelevant	R	EMPSi will complete a tech edit of the entire document.
216.	3-115	Table 3-34	Martin	FS	Table 3-34: Move to p. 3-116 so it's by the FS information.	R	EMPSi will complete a tech edit of the entire document.
217.	3-119	11	Martin	FS	Solid Leasable Minerals section. There is absolutely no tie to GSG. For example, the Coal section should tell you if any or how many leased acres are in PPH or PGH	M	Will get coal acres for PPH and ADH.
218.	3-119	32-39	Martin	FS	Rows 32 – 39 are a repeat of information presented on p. 3-117. Refer back and delete	R	EMPSi will complete a tech edit of the entire document.
219.	3-122	Table 3-37	Martin	FS	Table 3-37: 19,400 acres open to oil and gas leasing on the RNF does not sound right; there are only 12,501 acres of habitat on the RNF.	M	Acreage figures will be checked and re-checked for accuracy.
220.	3-123	Table 3-39	Creed Clayton	USFWS	Table appears to be out-of-date for PPH. With the release of the relatively new ROD for oil shale and tar sands, it appears that no oil shale leases would be offered in PPH. This is also stated in Table 2-4.	A	Updated info on oil shale leasing in PPH. Removed outdated table 3-39.
221.	3-125	Table 3-41	Martin	FS	Table 3-41: The numbers in this table seem high, particularly given numbers displayed in Tables 1-1 and 2-2	M	Acreage figures will be checked and re-checked for accuracy.
222.	3-126	04	Martin	FS	A period is missing at the end of the sentence.	R	EMPSi will complete a tech edit of the entire document.
223.	3-126	09	Martin	FS	A period is missing at the end of the sentence.	R	EMPSi will complete a tech edit of the entire document.
224.	3-126	12	Martin	FS	The number 8 should be 'eight'	R	EMPSi will complete a tech edit of the entire document.
225.	3-130	Table 3-46	Martin	FS	Table 3-46: 10,500 acres of coal potential on the RNF seems very high.	R	EMPSi will complete a tech edit of the entire document.
226.	3-136	11-22	Martin	FS	Delete rows 11 – 22; irrelevant	R	EMPSi will complete a tech edit of the entire document.

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227.	3-138	36	Martin	FS	Contractor's highlight: I would include the uranium mine information only if it's located in GRSG habitat.	R	EMPSi will complete a tech edit of the entire document.
228.	3-141	25	Martin	FS	Conditions on National Forest System Lands – there is no tie to GRSG in this section	R	EMPSi will complete a tech edit of the entire document.
229.	3-148	34	David Reis	FS NeST	The Forest Service, on November 9, 2005, adopted the Travel Management Rule, 36 CFR Part 212, provides policy to control the proliferation of unauthorized routes and to manage the forest transportation system in a manner by designating roads, trails, and areas for motor vehicle use.	A	Change made.
230.	3-149	01-19	Martin	FS	Delete rows 1 – 19; irrelevant	R	EMPSi will complete a tech edit of the entire document.
231.	3-153	24-29	Martin	FS	Rows 24 – 29 are a repeat of the same information on p. 3-152 (rows 35 – 38). Delete	R	EMPSi will complete a tech edit of the entire document.
232.	3-156	10-19	Martin	FS	Delete rows 10 – 19; irrelevant	R	EMPSi will complete a tech edit of the entire document.
233.	3-160	31-42	Martin	FS	Delete beginning with, "These include" on row 31 and delete to row 42; irrelevant. You've already directed people to the appendix, to let them go there for more information.	R	EMPSi will complete a tech edit of the entire document.
234.	3-161	01-18	Martin	FS	Delete rows 1 – 18 for the same reason above.	R	EMPSi will complete a tech edit of the entire document.
235.	3-163	Table 3-57	Martin	FS	Table 3-57: These numbers are way overinflated for the FS (12,49819,100)	M	Acreage figures will be checked and re-checked for accuracy.
236.	3-165	21-42	Martin	FS	Delete rows 21 – 42; irrelevant	R	EMPSi will complete a tech edit of the entire document.
237.	3-166	26	Martin	FS	The number 2 should be 'two'	R	EMPSi will complete a tech edit of the entire document.
238.	3-166	Table 3-62	Martin	FS	Table 3-62: Acres column reads ADH; should read PGH	R	EMPSi will complete a tech edit of the entire document.
239.	3-167	26	Martin	FS	The numbers 7 and 6 should be 'seven' and 'six'	R	EMPSi will complete a tech edit of the entire document.
240.	3-173	21-27	Martin	FS	Delete rows 21 – 27; irrelevant	R	EMPSi will complete a tech edit of the entire document.
241.	3-174	26-35	Martin	FS	Delete beginning with, "Research Natural" on row 26 to row 35; irrelevant	R	EMPSi will complete a tech edit of the entire document.

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242.	3-175	Table 3-66	Martin	FS	Table 3-66: SIA and RNA acreages cannot be correct. Check EC Report.	R	Information is from the BER Report. There is GRSG guidance that we must include data from the BER Report in our document.
243.	3-177	01-40	Martin	FS	Delete rows 1 - 40; repeat of Table 3-67 information	R	EMPSi will complete a tech edit of the entire document.
244.	3-178	01-42	Martin	FS	Delete rows 1 – 42; repeat of Table 3-67 information	R	EMPSi will complete a tech edit of the entire document.
245.	3-179	01-42	Martin	FS	Delete rows 1 – 42; repeat of Table 3-67 information	R	EMPSi will complete a tech edit of the entire document.
246.	3-180	15	Martin	FS	Number 3 should be ‘three’	R	EMPSi will complete a tech edit of the entire document.
247.	3-180	20-30	Martin	FS	Delete rows 20 – 30; irrelevant	R	EMPSi will complete a tech edit of the entire document.
248.	3-186	27	Martin	FS	Delete words ‘throughout the region’ (region is repeated in the sentence)	R	EMPSi will complete a tech edit of the entire document.
249.	3-195	01-42	Martin	FS	Delete rows 1 – 42; irrelevant	R	EMPSi will complete a tech edit of the entire document.
250.	3-196	01-35	Martin	FS	Delete rows 1 – 35; irrelevant	R	EMPSi will complete a tech edit of the entire document.
251.	3-200	18-42	Martin	FS	Delete rows 18 – 42; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
252.	3-201	01-41	Martin	FS	Delete rows 1 – 41; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
253.	3-202	01-24	Martin	FS	Delete rows 1 – 24; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
254.	3-204	18-31	Martin	FS	Delete rows 18 – 31; irrelevant	R	EMPSi will complete a tech edit of the entire document.
255.	3-206	36-39	Martin	FS	Delete beginning with, “The 2010 annual” on row 36 to end of row 39; irrelevant	R	EMPSi will complete a tech edit of the entire document.
256.	3-210	02-08	Martin	FS	Delete rows 2 – 8; irrelevant	R	EMPSi will complete a tech edit of the entire document.
257.	3-211	Diagrams 3-9 to 3-12	Martin	FS	Either explain the relevance of these Diagrams to the analysis or delete them. I don’t see how they add value to the analysis.	R	EMPSi will complete a tech edit of the entire document.

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258.	3-213	09	Martin	FS	The 'climate' section is BLM-centric	M	Angie/EMPSi folks are making a global change to include FS wherever it makes sense to do so.
259.	3-214	18-27	Martin	FS	Delete beginning with, "Carbon dioxide, methane..." on row 18 to end of row 27; irrelevant	R	EMPSi will complete a tech edit of the entire document.
260.	3-214	39-42	Martin	FS	Delete rows 39 – 42; irrelevant	R	EMPSi will complete a tech edit of the entire document.
261.	3-215	01-09	Martin	FS	Delete rows 1 – 9; irrelevant	R	EMPSi will complete a tech edit of the entire document.
262.	3-215	21-40	Martin	FS	Replace , "The following predictions were identified by the US EPA for the Mountain West and Great Plains region (US EPA 2008):" with "The US EPA for the Mountain West and Great Plains region outlines several predictions related to climate change including, but not limited to: 1) The region will experience warmer temperatures with less snowfall; 2) Temperatures may increase more in winter than in summer, more at night than in the day, and more in the mountains than at lower elevations; and 3) More frequent, more severe, and possibly longer-lasting droughts will occur. (US EPA 2008)." Delete rows 22 - 40	R	EMPSi will complete a tech edit of the entire document.
263.	3-218	Table 3-80	Martin	FS	Delete Table 3-80; this level of detail is not necessary.	R	Data helps put the impacts into context.
264.	3-219	Table 3-81	Martin	FS	Delete Table 3-81; this level of detail is not necessary	R	Data helps put the impacts into context.
265.	3-220	Table 3-82	Martin	FS	Delete Table 3-82; this level of detail is not necessary	R	Data helps put the impacts into context.
266.	3-221	Table 3-83	Martin	FS	Delete Table 3-83; this level of detail is not necessary	R	Data helps put the impacts into context.
267.	3-222	16	Martin	FS	Conditions on NFS Lands: There is no tie in this section relative to how data collected relates to the planning area and GRSG (through row 7 on p. 3-224)	R	EMPSi will complete a tech edit of the entire document.

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268.	3-222	Table 3-84	Martin	FS	Delete Table 3-84; this level of detail is not necessary	R	Data helps put the impacts into context.
269.	3-225	19-40	Martin	FS	Delete rows 19 – 40; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
270.	3-226	01-20	Martin	FS	Delete rows 1 – 20; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
271.	3-227	26-28	Martin	FS	Move Table reference in rows 26 – 28 to end of row 20. Delete rows 21 - 28	R	EMPSi will complete a tech edit of the entire document.
272.	3-227	33	David Reis	FS NeST	“Forest Service” paragraph needs to be moved below Table 3-85	R	EMPSi will complete a tech edit of the entire document.
273.	3-227	36	Martin	FS	Delete ‘in the Routt National Forest.’	R	EMPSi will complete a tech edit of the entire document.
274.	3-228	13-15	Martin	FS	Delete rows 13 - 15. Define terms in glossary.	R	EMPSi will complete a tech edit of the entire document.
275.	3-229	01-24	Martin	FS	Delete rows 1 - 24: Define terms in glossary.	R	EMPSi will complete a tech edit of the entire document.
276.	3-229	25-27	Martin	FS	Delete rows; irrelevant	R	EMPSi will complete a tech edit of the entire document.
277.	3-229	26	David Reis	FS NeST	Forest Service YEAR is 03/13/2003	M	<i>3.1.1 Just above: Existing Conditions</i> *change to be completed.
278.	3-237	10	David Reis	FS NeST	“City, State” is NATIONAL HEADQUARTERS (WO) WASHINGTON, DC	M	*change to be completed. (Just above LWC section).
279.	3-237	11	Martin	FS	Is Section 3.19 necessary? WSAs are discussed in section 3.14 beginning on page 3-172.	R	The BLM must include LWCs in our analysis of impacts. There is an important distinction between WSAs and LWCs.
280.	3-240	34-38	Martin	FS	Figures 3-13 to 3-16 are not included in the document.	R	EMPSi will complete a tech edit of the entire document.
281.	3-241	33	Martin	FS	Recreation and Off-Highway Vehicle Use – There is no tie in this section to GRSG; you mention specific areas but you don’t indicate if they’re adjacent to or within GRSG habitat.	R	EMPSi will complete a tech edit of the entire document.

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282.	3-244	05	Martin	FS	3.20.2 Trends is formatted differently than previous, similar sections (i.e., not broken out by BLM and FS)	R	EMPSi will complete a tech edit of the entire document.
283.	3-245	10-41	Martin	FS	Delete rows 10 – 41; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
284.	3-246	01-41	Martin	FS	Delete rows 1 – 41; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
285.	3-247	01-05	Martin	FS	Delete rows 1 – 5; unnecessary detail	R	EMPSi will complete a tech edit of the entire document.
286.	3-253	23-26	Martin	FS	Delete row 23 (heading). Rewrite row 24 to say, “BLM and Forest Service policy is to manage paleontological resources for scientific, educational, and recreational values and to protect or mitigate these resources from adverse impacts.” Delete beginning with, “To accomplish this goal” on row 26, p. 3-253, to row 18, p. 3-255. This is unnecessary detail.	R	EMPSi will complete a tech edit of the entire document.
287.	4		Terry Ireland	USFWS	Provide further qualitative and quantitative explanation in Chapter 4 on how conservation measures conserve GRSG and further explain qualitatively and quantitatively GRSG protections between the different alternatives. If the quantitative explanations are described in Chapter 2 (e.g. Table 2-8) refer to the appropriate Chapter 2 sections or Table(s) in Chapter 4 sections.	R	The BLM will add a table to the EIS that synthesizes the impacts to GRSG.
288.	4-013	02-04	Colt	FS	Suggested addition: Alternative A is the protection measures in the existing land use plans. These plans were developed to provide habitat for wildlife and maintain species populations. Nevertheless, the impacts described above would be the greatest among the alternatives analyzed. (The concept is that the existing land use plan is not just a free for all with no protection provided to wildlife.) This concept is carried throughout the Alternative A discussions.	R	Comment noted.

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289.	4-013	14, 16	Colt	FS	This paragraph seems to be focused specifically on GRSG. GRSG has its own section. The discussion of Alt C here should say more about impacts to other wildlife. (minor issue)	R	Comment noted.
290.	4-014	17-20	Colt	FS	Same comment as #2 above: This paragraph seems to be focused specifically on GRSG. GRSG has its own section. The discussion of Alt C here should say more about impacts to other wildlife. (minor issue)	R	Comment noted.
291.	4-016	09-11	Colt	FS	Suggest stating what some of the proposed restrictions would be, so the line officer can better understand what the impacts would be. (timing, season of use, xx% stocking reductions...)	R	
292.	4-019	19	Colt	FS	Should only state that D would be similar to B and not A since in lines 7 – 13 it states how A and B are different.	M	The BLM is going to review this section again for accuracy to ensure that it captures impacts to GRSG adequately.
293.	4-032	26-27	Colt	FS	Awkward wording	R	EMPSi will complete a tech edit of the entire document.
294.	4-033	01-08	Colt	FS	This discussion needs to be put in perspective. Dozer built fire lines (in and of themselves) have very minor impacts on big game when compared to the impact of the fire, especially in sagebrush where cheatgrass is present.	R	Comment with no suggested solution.
295.	4-033	12-13	Colt	FS	I disagree that smoke inadvertently drifting into an area would disturb nesting birds. Suggest deleting this statement.	R	Impacts are based on best available science/BLM specialist expertise.
296.	4-063	Section 4.4.2	Colt	FS	Since this analysis is really about the protection of sage-grouse and their habitat, I believe that this section should come before the general wildlife and aquatic sections. More of the specific analysis should be done on effects to this species, then the general wildlife section could state “impacts are the same as those discussed under Impacts from ... (see page 4-65 line 16).	M	The BLM will address this confusion by rearranging/modifying the sections.

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297.	4-063	Section 4.4.2	Colt	FS	From a conceptual standpoint, this analysis, like most traditional impact analyses covers the extent of the impacts to sage-grouse within each resource area. It basically says that alternative C has fewer impacts than alternatives B and D, and alternative A has the most impacts. This is fine, but what it doesn't cover is the key threats to sage-grouse that the FWS laid out and whether or not the different alternatives provide sufficient conservation measures to protect the species. e.g. "The management decisions described within fluid minerals management under alternative D are believed to be sufficient to protect sage-grouse populations because, ... <i>state supporting literature, arguments and logic.</i> " Such statements will help the Line Officers (deciding officials), FWS and the public to understand whether or not the management actions are sufficient to meet the intent of the EIS. I believe we need to do more to show what we are doing for sage-grouse than simply state that alternative C is more protective than the other alternatives and alternative A is the least protective.	M	The BLM will add a table to Chapter 4 to synthesize the impacts to GRSG.
298.	4-078	GRSG fluid minerals	Colt	FS	The impacts from fluid minerals management on Greater sage-grouse section, particularly the Summary of Impacts by Alternative is one of the more thoroughly written sections because it discusses the actual management decisions being made in each alternative and what impact they have on sage-grouse. (positive comment – no corrections needed.)	A	Comment noted.
299.	4-086	21	Colt	FS	Elsewhere in the document, we defined short-term as lasting less than two years. If this is the case, I disagree that the effects of unplanned ignitions would be "short-term." Effects vary by severity of the fire (meaning how much vegetation was killed), size (extent) of the fire, and how the burned area responds (cheatgrass or native plants return).	R	Comment with no suggested solution.

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300.	4-086	40-43	Colt	FS	I agree with the statements about the effects of fire suppression, however, when we are talking about fire suppression in sagebrush habitats, the direct impacts from fire suppression (dozer constructed firelines) are an insignificant loss with respect to habitat protected from their being employed. I believe we should include a statement that unplanned ignition wildfire in sagebrush communities is a significant threat to sage-grouse because of the loss (mortality) of sagebrush and long time required for its return (if at all based on the presence of exotic annual grasses); and that fire suppression is critical to minimizing sagebrush losses.	M	Wildfire and exotic grass invasion are bigger threats in the Great Basin. However, the analysis in the NWCO GRSG document does discuss the trade-offs between impacts from methods to control fire and the fire itself.
301.	4-087	08	Colt	FS	I disagree that smoke drifting into occupied sage-grouse habitat would disturb nesting birds. Suggest deleting this sentence.	R	Impacts are based on best available science/BLM specialist expertise.
302.	4-091	06-10	Colt	FS	In the Summary of Impacts for habitat restoration, iw is not clear why the different alternatives are more of less protective than any other. The statement in line 8 that C provides guidelines helps, but it is still unclear why B and D are have more impacts to sage-grouse.	M	The BLM will add a table to Chapter 4 to synthesize the impacts to GRSG.
303.	4-092	01-11	Colt	FS	(Similar to comment #10 above.) This Summary of impacts on sage-grouse simply states that alternative C has the least impacts to GRSG, alternative A has the most impacts to GRSG and C and D are in the middle. This qualitative analysis is fine, but it doesn't really tell the deciding Official what is really needed from this document, that is, whether or not any given alternative is sufficient to protect sage-grouse. The paragraphs in this summary section should be the most important in the entire document.	M	The BLM will add a table to Chapter 4 to synthesize the impacts to GRSG.

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304.	4-094	Section 4.4.3	Colt	FS	The formatting for the different subsection headings changed from previous sections. Specifically the resource categories (pg. 4-98 line 35) are in a normal font and underlined as opposed to italics and not underlined in all the other sections.(minor issue)	A	Angie/EMPSi, please make sure headings are consistent and easy to find (maybe bold and underlined?)
305.	6-010	None	David Reis	FS NeST	Remove “Minerals-Leasable, Coal, Locatable, Salable” under duties for David Reis	A	Change made.
306.	E-001	05	Griffin	CPW	CPW requests that the reference needs to state that the management zones were ADAPTED from the referenced documents. BLM changed the zone numbers and added some zones (e.g., the linkages were given their own zone numbers).	R	Description in chapter 1.
307.	E-001	13	Griffin, Petch, Warren	CPW	CPW would like to have BLM include a map that depicts an overlay of the 21 management zones with the 5 BLM FO boundaries to depict where the management zones are split by a BLM jurisdictional boundary. A map depicting such an overlap will help to better identify and manage the disturbance, as is referenced in Alt. D.	M	Agree that this map would be necessary for implementation of disturbance cap depending on final decision.
308.	E-001	13	Griffin, Petch, Warren	CPW	Reference is made to ecological sites capable of supporting sagebrush. CPW thinks that a map or set of maps depicting the ecological sit capability would be helpful to those using the RMP.	A	Map showing ecological sites supporting sagebrush will be included.
309.	E-002		Terry Ireland	USFWS	Include reason why buffers were not included in disturbance cap calculations under the alternatives. (in Appendix E and/or body of EIS)	R	Buffers are used in analysis of impacts, not disturbance cap calculations. Not clear what buffers are referred to.
310.	E-002	05-06	Griffin, Petch, Warren	CPW	Line 5 reads “...and the disturbance objective in these areas is as close to zero as possible. CPW recommends providing a number or a range to provide more clarity and certainty to the user.	M	Removed language “as close to zero as possible” – LUPs restrict development in riparian areas.
311.	E-002	05-06	Griffin, Petch, Warren	CPW	Disruptive impacts do not appear to be described or defined in the document.	R	Disruptive impacts are described in Chapter 4 – impacts to GRSG and terrestrial wildlife.
312.	E-003	38	Griffin, Petch, Warren	CPW	CPW would like BLM to include maps of the ecological sites capable of supporting sage brush.	A	Change made – added a figure depicting ecological sites capable of supporting sagebrush.

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313.	E-004	16	Griffin, Petch, Warren	CPW	The sentence reads "Mitigation can take many forms, in the modern era, most..." The sentence would read better if "in the modern era" was deleted and the rest of the sentence remained the same.	A	Change made.
314.	E-005	20 and throughout	Griffin, Petch, Warren	CPW	CPW would like to see BLM clarify the use of exemptions throughout the document. For example, there are exemptions from the disturbance cap, exemptions for the NSO stipulation, exemptions from mitigation requirements and exemptions from from prioritization. The language in Appendix E seems to go back and forth as to what is being 'exempted'. CPW thinks it would help the reader to clarify which exemption is being discussed each time the term is used.	M	BLM is developing stipulations appendix that will describe exemptions in detail.
315.	E-006	27-34	Griffin	CPW	This paragraph attempts to deal with the issue of a "rush" on the disturbance cap. However, it only describes an evaluation process but it does not clearly get at HOW the BLM will address a "rush". The scenario may occur where a number of projects are proposed (all early on in the distribution of the disturbance cap) that are all "legitimate" and have a high "value to society". BLM needs to clearly state how they intend to minimize the risk of a "rush" on the cap space.	M	Details on how BLM would manage cap space would be included in the implementation plan with the final EIS.
316.	E-008 to ES-010	Tables	Griffin	CPW	The Preliminary Disturbance Data tables need to have the headings and descriptions clarified. The headings should have which Alternative applies rather than have this as a footnote. Also, the 2 columns titled "Percent of Management Zone" is confusing because there are 2 with the exact same title. Is the second one a "Total of Disturbance within the Management Zone"?	A	Change made.
317.	F	Throughout	Griffin, Petch, Warren	CPW	Appendix F is also labeled Appendix D on the cover page. Also throughout the entire document references are made to the White River Field Office (WRFO). The footer also refers to WRFO.	A	Angie/EMPSi – please make sure these labels are correct and that the abbreviations are correct.

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318.	F-005	Section 1.2 Authority	Griffin, Petch, Warren	CPW	The last two sections/paragraphs of the section need to be updated to have consistent wording with the proposed RMP.	R	Will replace this appendix with appendix from FEIS when available.
319.	H	Throughout	Griffin, Petch, Warren	CPW	CPW recommends that Colorado Oil and Gas Conservation Commission (COGCC) review appendix H to see if any of the recommendations being made in the appendix are in conflict with State Rules.	M	COGCC will receive a copy of the document during the public review period for the DEIS.
320.	H	Throughout	Griffin, Petch, Warren	CPW	This appendix is taken from North Dakota's GRSG RMP. Please change footers and all other references of local operators to reflect Colorado's RMP document.	A	Angie/EMPSi – please make sure footers are correct and refer to NWCO effort.
321.	H	Throughout	Griffin, Petch, Warren	CPW	This appendix is taken from North Dakota. The design features are a good starting point but important ancillary impact causing activities are missing and should be included for the draft plan. Features like compressor stations, pipelines, seismic activities should have BMPs. CPW is uncertain if the design features are rigorous enough to meet F&W Service test of regulatory certainty since the design features are either preferred or suggested; neither is required for the entire set of BMPs. It is understood that design features are applicable only to the CSU stipulations.	R	The SDFs are only suggested where we do not have authority to require them (only for locatable minerals – 1872 Mining Law).
322.	H	Throughout	Griffin, Petch, Warren	CPW	Modify – tweak all design features to reflect Colorado's circumstances. As written, many BMPs are partially or not relevant.	R	The design features vary by alternative and PDFs would be implemented where necessary, appropriate and technically feasible.
323.	H-004	13	Terry Ireland	USFWS	Apply to ADH. Recommend for all new wells and existing wells as feasible.	R	Within range – under alternative C, no new leasing would be authorized in ADH.

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324.	H-005	Feature 30	Creed Clayton	USFWS	For Alternative D we recommend this feature be required in PPH, rather than just preferred. We also recommend that all pits be regularly monitored for compliance and the presence of grouse that may have somehow gained entry. Monitoring reports should be submitted to BLM on a regular basis. (I have witnessed first-hand dead grouse in a produced water pit in NW Colorado and seen photos of other dead grouse in pits in Colorado.)	R	Within range of alternatives.
325.	H-005 (also 2-135)	Feature 33 (NTT 60)	Creed Clayton	USFWS	For Alternative D we recommend that closed-loop drilling systems be a required feature for any NSO exceptions granted in PPH.	R	Within the range – RDF for alts B and C.
326.	H-006	40	Terry Ireland	USFWS	Also set at no more than 10 decibels above ambient sound measured at sunrise at leks.	M	Added requirement for noise RDFs to use best available data for locating compressor stations.
327.	H-015	Footnote I	Terry Ireland	USFWS	C (connectivity habitat), is by default, included in ADH but there is no “(C)” mentioned by itself anywhere in the Design Features. Also, as an FYI remember to take the page heading out of the public draft of the EIS since it states that this is a North Dakota RMPA/EIS draft.	A	Angie/EMPSi – please make sure footers are correct and refer to NWCO effort.
328.	4-8	34	Martin	FS	<u>Direct habitat loss</u> is the first indicator for this section (4.3) and should be discussed first. (Habitat degradation, which is listed first, is actually the 4 th bullet for this section.)	R	Angie/EMPSi to complete a tech edit of the entire document.
329.	4-9	2 - 5	Martin	FS	Alternative B states that it provides the most protection for terrestrial wildlife. Alternatives C and D state the same thing. They can’t all be the most protective.	M	The BLM will add a table to Chapter 4 to synthesize the impacts to GRSG.