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AZBELL & GROVES
ATTORNEYS & COUNSELORS AT LAW

November 19, 2013

Bureau of Land Management
Attn: Erin Jones
2815 H Road
Grand Junction, CO 81506

RE: Northwest Colorado Greater Sage Grouse Draft LUPA/EIS

Dear Ms. Jones,

As a long-time resident of northwest Colorado, I would like to comment on the referenced sage-grouse EIS. Having looked at the Alternatives offered in the draft, and the information provided by other sources, it is clear to me that the BLM did not take fully into account all of the available data before reaching its conclusions and drawing up proposed measures. The National Technical Team report that the BLM leaned so heavily on in formulating this draft is incomplete at best, having disregarded or overlooked critical data pertaining to sage grouse habitat in the NW Colorado region.

As several other studies have shown, and as the authors of the EIS even state when referring to the Garfield County Sage Grouse Plan, the habitat in this area is fragmented, as opposed to the maps used by the BLM which indicate continuous sage grouse habitat over much of the NW Colorado area.

As a result of using poor information, it goes without saying that the measures prescribed will be correspondingly faulty. The No Occupancy Zones placed around lekking sites, extending out in many cases to 4 miles, were not established with any regard paid to scientific data, but rather seem to have been selected arbitrarily. The fact that they are mostly targeted against fluid minerals (oil and gas) further suggests a motivation beyond scientific rigor. The same is true of the disturbance caps; there is no evidence that even a 5% disturbance cap is required, in the areas called for in the EIS, to preserve and protect sage grouse habitat.

These disturbance caps, both individually and cumulatively, will greatly limit the amount of economic development activity that can occur in the region, and will specifically limit the largest and most important industries to NW Colorado.

I urge your office, before taking drastic measures that will do irreparable harm to families living within NW Colorado, to please step back, objectively evaluate the available data, and make the

information fully available to the public. The Americans who will be most impacted by your decisions deserve to have the process by which those decisions are made be as open and transparent as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik R. Groves', with a stylized flourish extending to the right.

Erik R. Groves

