

**To: NEPA Coordinator, Bureau of Land Management, Northwest Colorado District**

**From: Carol Cameron**

**Date: December 1, 2013**

**Re: Comments on Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment/Environmental Impact Statement**

I am a Colorado resident, a birder, and a volunteer for Conservation Colorado and Audubon.

Thank you for the opportunity to comment on the above-referenced draft LUPA/EIP. I attended an open house meeting in October to gain background information on this topic; I spoke with several BLM representatives as well as representatives of Conservation Colorado in Denver and Grand Junction; and I reviewed the draft document and other related materials.

First, let me express appreciation for the work of the many cooperating agencies involved in developing the draft document. It's clear that much attention is focused on the challenge of protecting this magnificent bird and its habitat. Extensive technical study and critical thought are evident in this product.

Regarding Alternative D, the BLM's preferred alternative as outlined in Table 2-4, I have these comments:

- 1) Mineral Leases. When I studied the map of Greater Sage-Grouse habitat superimposed on the map of existing mineral leases, I was struck by the extent of the overlap. I believe exploration and development under existing mineral leases pose a great threat to habitat functionality and sustainability of the species. I suggest:
  - a) NTT #46 Fluid Minerals. Instead of reliance on No Surface Occupancy (NSO) stipulations, which can be waived, follow the Alternative B approach to close Preliminary Priority Habitat (PPH) areas to fluid mineral leasing. Upon expiration or termination of existing leases, do not accept nominations/expressions of interest for parcels within priority areas.
  - b) NTT #60 Fluid Minerals. Introduce options to amend, cancel, or buy out existing leases in PPH areas.
  - c) Fluid Minerals. When feasible, offer to swap existing leases for leases outside all designated habitat (ADH) areas. This approach may help to alleviate the local economic impact of constraints on energy development in PPH areas as discussed in Section 3.24.
- 2) Special Management Designation. I urge that all PPH be designated as an Area of Critical Environmental Concern as discussed in Section 2.6.1 to emphasize the importance of Greater Sage-Grouse habitat conservation.