

December 2, 2013

Ms. Erin Jones
NEPA Coordinator
Bureau of Land Management
Northwest Colorado District Office
2815 H Road
Grand Junction, CO 81501

Dear Ms. Jones:

Thank you for providing opportunity to provide comment on Greater Sage-Grouse Draft Land Use Plan Amendment/Draft Environmental Impact Statement (Draft LUPA/EIS) for the Colorado Bureau of Land Management (BLM) Northwest Colorado District/ These comments represent the input from The High Lonesome Ranch (HLR), a landowner (over 38,000 acres) within the Grand Junction and White River Field Office administrative boundaries and an affected stakeholder from actions considered within the Draft LUPA and EIS. Our comments are directed to those areas and actions that will have direct impact on HLR private property, management of sage grouse habitat on deeded and BLM lands permitted for HLR uses including grazing and recreation, and the ability for the HLR to manage surface rights and sub-surface rights in accordance with the HLR vision and mission, and finally the ability for the HLR to enter into formal agreements with the US Fish and Wildlife Service(FWS), Natural Resources Conservation Service (NRCS) and Colorado Parks and Wildlife (CPW) on sage grouse management and the Endangered Species Act (ESA). We believe our comments meet the criteria to be considered, “substantive” by BLM and look forward to them being adequately addressed during the process to finalize the Draft LUPA and EIS and look forward to working with BLM as a neighbor in the stewardship of this unique landscape. ***(Please note that all acres used in this comment letter are approximate based on GIS analysis from different databases publically available. We understand that these acres will probably change as more detailed and accurate analysis is completed on updated databases)***

The High Lonesome Ranch (HLR) comprises approximately 400 square miles of deeded and leased public lands administered by the BLM, located north of Grand Junction, Colorado, between DeBeque on the east and Loma on the west. HLR comprises lands that have been in agricultural and ranching uses since the mid 1800’s and experienced some energy development in the late 1900s. Elevations at the ranch rise from approximately 4,000 to 9,200 feet. Habitats range from desert to sub-alpine on high mesas, including farm fields, spring-fed creeks, wetlands, ponds, sagebrush, juniper, oak, aspen, pine and fir forests. The HLR Vision and Mission statement are as follows:

HLR Vision: *Our lands, waters, and resources are healthy and productive for compatible values and uses, demonstrating how private and public lands can be stewarded in perpetuity for ethical uses and economic vitality. This effort will further and model a land ethic.*

HLR Mission: *Stewardship of ecologically and economically resilient, compatible-use, landscapes for generations.*

The High Lonesome Ranch has undertaken an ambitious conservation and restoration agenda, engaging a variety of public, private, non-profit and scientific partners. Highlights of work recently completed/currently underway include the following:

Integrated Ranch Management Plan: Ranch managers have created an integrated plan that enables them to work with government agencies for better ranch management, and also to allow for a collaborative approach to conservation and large-scale habitat projects, in conjunction with the BLM and Colorado Parks and Wildlife, the state game and fish agency.

Biodiversity Inventory & Monitoring Program: The ranch partnered with the Academy of Natural Sciences of Drexel University to prepare an inventory of plant and animal species associated with streams and ponds on the ranch, assessing the health of various species and habitat types. The study was initiated in 2008 and concluded in 2012. The report included field verification of potential species present.

Stream and Ecological Restoration of North Dry Fork and Kimball Creek Valley: One of the first habitat reclamation efforts on the ranch was a multi-year project to restore 7 linear miles of the highly-eroded and degraded North Fork Dry Creek (in valley where headquarters for The High Lonesome Ranch is located). A second project, restoration of 17 linear miles of Kimball Creek (in neighboring Kimball Creek Valley), is currently underway.

Participation in the Colorado Department of Parks and Wildlife's Regional Sage-Grouse Working Group: The ranch has been an active member of the CPW Parachute, Piceance, Roan local working group that is working to conserve greater sage grouse habitat. The greater sage grouse is currently a candidate for listing as a threatened or endangered species under the Endangered Species Act. CPW is developing a framework to guide management efforts and integrate existing and potential land use activities on public and private lands in the area. Secretaries of USDA and USDI recently unveiled their Working Land Wildlife Initiative (WL4W) that lists sage grouse as 1 of 7 focal species for the nation. HLR has drafted a Candidate-species Conservation Agreement with Assurances (CCAA) for the US Fish and Wildlife Service and is negotiating on the process for approval and implementation.

Landscape-scale Responsible Energy Development: HLR is working to develop a strategy for "landscape-scale" energy development that integrates water, fish, wildlife and aesthetic values and other uses of the ranch with exploration, site development and transportation. Based on the Theodore Roosevelt Conservation Partnerships approach to responsible and balanced energy development, the ranch is demonstrating how development can be done better than current models being used on adjacent Public Lands. The ranch has led the development of a local stakeholder group that includes energy companies, conservation organizations, county, state and federal agencies and neighboring landowners.

Conservation of Greater Sage Grouse: HLR is in negotiations with the US Fish and Wildlife Service to establish a Candidate Conservation Agreement with Assurances for approximately 30,000 acres of HLR deeded acres which includes approximately 4,000 acres of Primary Habitat (both Preliminary Primary Habitat and Preliminary General Habitat) for greater sage grouse. This effort is the only CCAA for greater

sage grouse in Colorado and essential to the future management of the ranch to provide operation certainty and be exempt from potential future restrictions if the sage grouse is listed under ESA. HLR is also working with NRCS to enter into an agreement under the Working Lands for Wildlife program which would give a 30 year assurance for the future of ranch operations and sage grouse management.

Mule Deer Conservation: HLR is partnering with the Mule Deer Foundation, CPW, industry, and other private landowners in the area to work on landscape scale mule deer habitat management.

In 2011 the HLR entered into a partnership with the Theodore Roosevelt Conservation Partnership (TRCP) to create a “demonstration project” for the development of energy at the landscape-level employing recommendations from the TRCP’s “FACTS for Fish and Wildlife” (FACTS) principles (see attached FACTS summary). A local stakeholder group has been formed which includes BLM, NRCS, CPW, HLR, Energy Industry, Environmental Non-Profit Organizations, local landowners, local elected officials and others. The group has met numerous times and is in the process of developing a framework for future management (similar to a Coordinated Activity Plan) and mitigation plan which includes a baseline assessment, implementation plan, monitoring plan, and funding plan.

Attached is a map of the proposed “demonstration project’ area boundary that we would like to recommend to BLM for inclusion into the Final LUPA and EIS due to efforts to conserve sage grouse that are included in the plan. This effort was guided by the Geographic Area Plan (GAP) approach outlined by House Bill 1298 (passed in 2007) and the **Habitat Stewardship Act of 2007** (§ 34-60-128). The area includes a significant portion of HLR deeded properties and a sizeable area of BLM grazing leases held by HLR. The area is approximately 220,000 acres which includes 50,000 private land acres of which 28,965 acres are owned by HLR (the largest landowner in the proposed area). This area is a good scale to work at landscape level energy development and has been developed based on the geography of the area, biology/ecology of important focal species (mule deer, elk, sage grouse, and federally protected plant species), hydrology, ownership, and access. Managers and biologists from the Colorado Parks and Wildlife (CPW) and Grand Junction BLM provided input into the boundaries based on the ability to manage fish and wildlife populations and associated habitats for important focal species. HLR owns strategic access to BLM lands within portions of the demonstration project boundary and is willing to work with BLM and mineral lease holders on access to currently inaccessible areas. The area also has a significant amount of “no surface occupancy” for most of the area which creates a major problem for development when only BLM lands are considered without adjacent private lands. The boundary is adjustable based on further review and analysis and what makes better opportunities for collaboration during the RMP process.

In addition to creating a boundary that work could be focused on, the group is working to identify specific objectives for resources and processes that collaboration and cooperation would focus on. The list below represents the initial objectives that have been discussed by the group.

Landscape intactness/reduction of fragmentation – we propose that future development be completed from the valley bottoms versus the tops of the ridges. This approach will reduce impacts from fragmentation, keep the landscape more intact, maintain biodiversity and abundance of natural

resources, and reduce costs for road building, transmission, and other infrastructure. The uniqueness of the landscape lends itself to this approach – long narrow ridges, palisade cliffs, fragile soils – in addition to the existing road infrastructure that exists.

Advanced development techniques – we proposed that directional drilling and other advanced technological drilling techniques should be required. This will allow access to existing and future leases from the best location, reducing undue and unnecessary impacts to the environment. Techniques like drilling islands, phased development, central production facilities, buried transmission, and consolidate/shared infrastructure should be implemented to the maximum extent practicable.

Mule deer habitat work and coordination – cross boundary coordination on habitat improvement projects (juniper removal and thinning as a primary issue) would increase habitat productivity thereby help contribute to CPW population management and meet set objectives and harvest strategies. This would help address the regional declining population trend, and work would coordinate with Piceance basin research projects.

Greater sage grouse coordination – the area currently is occupied by a small but extremely valuable sage grouse population. The grouse that are found within the area are the southwestern-most greater sage grouse in Colorado and the closest population to the Gunnison’s sage grouse. There is approximately 12,000 acres of “priority habitat” identified by CPW within the area consisting of Primary and General Priority Habitats (PPH and PGH). HLR has submitted a Candidate Conservation Agreement with Assurances application to the US Fish and Wildlife Service for long-term conservation of this habitat and is undertaking numerous actions on habitats and practices to improve conditions for grouse. There are ample opportunities to coordinate with the BLM on this effort through a Candidate Conservation Agreement (CCA) for the BLM lands identified as priority habitat and future sage grouse habitat work. This is compatible with the National Sage Grouse Strategy and CPW guidance.

Access/Recreation - opportunity to improve existing access points to public land and manage trespass and resource damage caused by illegal or unethical off highway vehicles.

Livestock Grazing – coordination on grazing strategies based on needs for livestock and wildlife during this effort could streamline permit renewals, coordination with efforts for greater sage grouse, help BLM meet requirements for healthy rangelands and help with Standard and Guides assessments.

Leasing/Permitting – provide incentives for energy development to coordinate and cooperate on the development of existing and future energy development (on BLM and private lands) for working on conservation and other important values for stakeholders. Access to currently landlocked leased acres could reduce conflict, provide certainty for permitting times and access if part of the Geographical Area Plans, smarter leasing with assured access for development with agreement

Population/Habitat goals – adaptive management implementation to provide flexibility in surface use restrictions and/or timing limitations, work to improve degraded habitats, stop downward trend in populations, and manage habitats based on environmental changes and permitted uses.

Federally Listed Plant species – work within the Endangered Species Act to create Safe Harbor Agreements, protected nursery locations and reduce conflict resolution on specific projects.

Native Plants – provide collection areas for seeds, establish nursery locations for local plants, reclamation opportunities for better success.

Support from stakeholders/NGOs – local working group functioning as a coalition, less conflict, better compliance and better probability for successful implementation of energy and other actions.

Balanced/responsible development – no net loss of important resources, net gain in conservation, less conflict/litigation, and more energy extracted.

Incorporate latest and best available science – adaptability and flexibility for stipulations, conditions of approval, reclamation and other permitted actions based on emerging issues and knowledge given specific action and health of other values/resources.

Compensatory mitigation/CO Habitat Exchange – place for piloting new policies, habitat banking/credits opportunities, influence implementation of state and federal mitigation policies.

Our concern about the Draft LUPA and EIS lie primarily with the ability for the HLR to carry-out the above mentioned programs. The BLM needs to ensure that the Final LUPA and EIS accommodate our needs described above, do not prevent the HLR from proactively managing sage grouse and entering into a CCAA with the FWS and a WL4W agreement with NRCS, and most importantly that the BLM's selected alternative and actions are based on best available science and will PREVENT a need for the FWS to list the greater sage grouse under ESA. An ESA listing can complicate the management of all landscapes within the HLR and affect all actions including proactive habitat work for mule deer and other species.

The High Lonesome Ranch is committed to working with the BLM to meet its mandate and our vision for this wonderful landscape for which we share stewardship responsibility. We respectfully request you consider our described needs in the preparation of the Final LUPA and EIS for the management of BLM lands in northwestern Colorado. By working together we can accomplish much more than if we continue to work separately and implement practices that have cause resource declines, conflict, and difficult working environments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Stewart', written over a horizontal line.

Scott Stewart, General Manager
The High Lonesome Ranch

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CC: John Melhoff, BLM CO State Director
Neil Kornze, Principal Deputy BLM Director
Jim Cagney, NW CO District Manager

Attachment/Links to relevant information:

TRCP FACTS (www.trcp.org/assets/pdf/FACTSfor_web.pdf)

Manier, D.J., Wood, D.J.A., Bowen, Z.H., Donovan, R.M., Holloran, M.J., Juliusson, L.M., Mayne, K.S., Oylar-McCance, S.J., Quamen, F.R., Saher, D.J., and Titolo, A.J., 2013, Summary of science, activities, programs, and policies that influence the rangewide conservation of Greater Sage-Grouse (*Centrocercus urophasianus*): U.S. Geological Survey Open-File Report 2013–1098, 170 p., <http://pubs.usgs.gov/of/2013/1098/>.BLM CO Plateau REA

BLM Draft Regional Mitigation policy

(http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2013/IM_2013-142.html)

WAFWA MD Working Group (http://muledeerworkinggroup.com/index_files/Page1525.htm)

CO Habitat Exchange (<http://enviroincentives.com/resources/documents>)

HLR Landscape GAP map – attached.