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November 26, 2013

NEPA Coordinator
Bureau of Land Management, Northwest Colorado District
2815 H Road
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GRAND JUNCTION, CO
2013 DEC -2 PM 2:21

RE: Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment
and Environmental Impact Statement

Dear NEPA Coordinator,

We have reviewed the Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement (DLUPA/EIS) and offer the following specific comments on behalf of the County of Jackson, State of Colorado.

It is stated in the second paragraph on Page 4 of the DLUPA/EIS that "The BLM's Northwest District office and the Routt National Forest have mapped this (GRSG) habitat preliminarily in cooperation with the CPW". Wouldn't it be more accurate to state that Colorado Parks and Wildlife delineated the GrSG habitats and provided the digital data to the BLM and National Forest to prepare the preliminary habitat maps for the DLUPA/EIS. This would make it clear that CPW was the responsible agency for the GRSG habitat boundary delineations. Would the BLM and USFS continue to refine these boundaries, or would this refinement be accomplished by the CPW in coordination with avian biologists from the federal agencies?

It is our understanding from meetings with CPW personnel, that the GRSG habitat maps for the North Park Basin were produced utilizing empirical probability modeling to estimate the probability of Greater Sage-grouse utilizing portions of the landscape based on vegetation classifications and radio telemetry data. Historical observations by county residents of Greater Sage-grouse use of landscapes, especially wet meadows and irrigated hay lands indicate that the empirical probability modeling delineating summer GrSG habitat that is incorporated in preliminary priority habitat (PPH) needs additional revision and clarification. This is especially critical considering that most of the wet meadows and irrigated hay lands are held in private ownership.

4th Paragraph, Pge 246 of the DLUPA/EIS – Information on active leks in Jackson County is wrong. There are **not** approximately 39 active leks in the North Park Basin. There were thirty-two active leks 2012 and 28 active leks in 2010. The median and mean of active leks in the North Park basin from the period of record from 1973 to 2012 is 29 and 28 respectively. Since this draft land use plan amendment and environmental impact statement is directly a result of mandated analyses related to Greater Sage-grouse, it would seem that it would be a paramount

consideration to insure data and statistics on Greater Sage-grouse is accurate throughout the document.

4th Paragraph, Page 296 of the DLUPA/EIS – The North Park Basin occupies approximately 1620 square miles, not 2250 square miles. The oil and gas reserves in the North Park Basin are not primarily in the form of coalbed natural gas. Don't even know what the terminology coalbed natural gas refers to. The known and potential oil and gas reserves in the North Park basin are contained in conventional reservoir formations or in the Niobrara Formation.

2nd Paragraph, Page 401 of the DLUPA/EIS – This section should be totally rewritten to separate out statements regarding the North Park area from statements on the Roan Plateau.

Pages 425 through 427 of the DLUPA/EIS – Clarification needs to be added that explains the term “Mining” includes Oil and Gas development. This whole section does not accurately address contributions in earnings from oil and gas and the employment related to oil and gas development. Maybe it was the intent to obscure the economic benefits from oil and gas development in order to downplay the negative economic impacts the proposed draconian conservation measures and timing restrictions would have on oil and gas development in the North Park Basin.

Page 441 of the DLUPA/EIS- The source of tax data from Jackson County as shown in Table 3.95 is not identified. Is there any assurance that the information shown for Jackson County is accurate?

Estimates of adverse economic impacts on Jackson County from decreases in local property taxes collected as a result in decreased assessed valuation resulting from a reduction in oil and gas production is not included in analysis. Statistics on local property taxes collected by counties and other gov't entities is available. Adverse impacts from estimated loss in local property tax revenue from loss in county assessed valuation of oil and gas production should be included in this analysis. This is critical since even a small reduction/loss in property tax revenues and loss of job producing revenue from a reduction in numbers of oil and gas employees will have a disproportionate adverse economic impact because of Jackson County's small overall employment base, associated labor income and the lower available property tax revenue base for the provision of local government services. An analysis of these adverse economic impacts is especially critical since Jackson County has a higher percentage of residents below the poverty level than the national percentage.

Under Alternative B, priority GRSG habitat areas would be exclusion areas for new BLM right-of-ways. It is our understanding that under BLM guidance, exclusion is a complete prohibition without exception. This exclusion would deter economic investment and development of not only renewable energy, but also the economic investment and development in oil and gas, saleable minerals and even investment and development in the livestock industry. Deterred

economic investment and development would be especially devastating in Jackson County where the entire floor of the North Park Basin has been preliminarily designated Priority GRSG habitat. Prohibition on any new ROW's on public lands within this large area of Jackson County is not acceptable under FLPMA mandates.

It is felt that the socioeconomic analysis in the DLUPA/EIS is woefully inadequate and underestimates and underreports probable negative impacts to the local communities in the North Park Basin and to Jackson County as a whole. This inadequacy in the socioeconomic analysis should be corrected before there is a record of decision on this Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement.

3rd Paragraph, Page 490 of the DLUPA/EIS – The wording that “no more than 100 acre-feet of aggregate federal new depletions in Jackson County are being addressed under the Federal-Colorado-SPWRAP-Jackson County Agreement for exclusively “piscatorial, wildlife, and environmental” purposes” may be confusing. The Agreement referenced above limits PWEI depletions to 87.5 acre-feet annually.

The analysis and management recommendations in the Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement rely heavily on the BLM National Technical Team's Report (NTT) Report. We believe the NTT Report fails to make use of the latest scientific and biological information available and to acknowledge lower impact technologies and mitigation currently in use by the oil and natural gas industry. In addition, the NTT report asserts that impacts from oil and natural gas development are universally negative and severe, but provides no scientific data to support that mistaken assertion.

In conclusion, single species conservation and management at the expense of all other uses is not appropriate for the FLPA mandated variety of uses of the public lands.

We appreciate this opportunity to provide comment on the Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement.

Respectfully submitted,



Wm. Kent Crowder
Jackson County Administrator

Cc: Board of County Commissioners of Jackson County

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