

Matheson Ranch
2057 County Road 24
Kremmling, CO 80459

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

To whom it may concern:

As livestock producers in western Grand County, we have serious concerns about many of the aspects of the EIS that, if implemented, will adversely affect our livelihoods and our communities. First, in reference to the CCA and PLC comments, we agree completely. In summary, their comments were that the EIS is fundamentally flawed due to the following:

1. The document does not contain an adequate range of alternatives as required under the NEPA.
2. The analysis and recommendations rely heavily on the NTT report, which failed to include recent scientific and commercial data that would limit the ability of the agencies to meet their multiple-use mandates.
3. The agencies have proposed overly broad and rigid management restrictions in mapped habitat areas.
4. The analysis underestimates the negative socioeconomic impact in the planning area.
5. The disturbance cap methodology proposed is not clearly defined and lacks scientific justification.
6. The document does not adequately explain the proposed mitigation strategy or the context for its use.

Again, we agree completely. Secondly, on an individual note, part of our operation is on private and BLM land in the priority or general GSG habitat, depending on whose map you look at. As with most ranchers in this area, our summer pasture is primarily public land. We know firsthand significant efforts have already been undertaken to conserve GSG. We have been told fragmentation is one of the things that affect the GSG the most and ranching activities in our area have preserved the contiguous open private lands, unlike the fragmentation that is happening on the east end of Grand County. If we lose our grazing permits or are regulated off of them, we lose our livelihoods and our base deeded land may go the way of fragmentation. We also strongly oppose retiring permits or grass banking, mandatory or voluntary. This removes grazing land from production and takes money out of our communities and schools. We find it ludicrous that our grazing activities may be in jeopardy when no one can say for sure if coyotes and birds are a predator problem for the GSG and GSG eggs; that when you look at the EIS Range Management objectives, you read "avoid GRSg habitat changes due to herbivory and avoid direct effects of herbivores on GRSg, such as trampling of nests and eggs" – where in the EIS does it hold the herbivores elk, deer and antelope accountable and what is the alternative to 700 elk migrating thru a lek? Sorry – hard not to ramble when nobody knows the answers let alone the right questions.

The flawed EIS is proposing a single issue management approach to public ground with multiple use mandates, which is in contradiction. This all started with a law suit by a group of people with an agenda and we can't help but wonder if the EIS is part of someone's agenda. We, as people who live and work in the planning area, have a vested interest in the outcome. We are seriously concerned about the viability of livestock grazing, the sustainability of our livelihoods in beef production and the

economic impact to our communities. We respectfully request that the issues identified above by the CCA and the PLC be addressed before the final EIS – our futures may hang in the balance.

Sincerely,

Diana L Matheson for Matheson Ranch