



TRAPPER MINING INC.

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CRAIG, CO

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November 22, 2013

John Mehlhoff
Acting State Director, Colorado
Bureau of Land Management
2850 Youngfield Street
Lakewood, Colorado 80215

Dan Jirón
Regional Forester, Rocky Mountain Region
U.S. Forest Service
740 Simms Street
Golden, Colorado 80401

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

Dear Mr. Mehlhoff and Mr. Jirón:

Please accept these comments from Trapper Mining Inc. with regard to the Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement (DLUPA/EIS). Trapper Mining Inc. operates a surface coal mining operation (Trapper Mine; hereafter Trapper) in Northwest Colorado a few miles south of Craig. Trapper operates on private and state lands and is situated at the edge of what is mapped as Preliminary General Habitat (PGH). Trapper is a leader in the coal industry with regard to environmental stewardship, reclamation excellence and community involvement, having received many state and federal awards for our achievements in these areas.

Trapper agrees with federal land management agency attempts to conserve and protect Greater Sage Grouse (GSG) habitat in northwest Colorado that will hopefully head off an ESA listing by the U.S. Fish & Wildlife Service (USFWS). However, we have serious concerns with the draft document and offer the following comments.

1. The range of alternatives needs to include the Colorado Division of Parks and Wildlife (CDPW) GrSG conservation plan (the Colorado Plan). The Colorado Plan includes conservation measures that were developed at great effort over many years with meaningful input and agreement from state and local governments, interested citizens, private landowners and your own federal land management agencies. We would request that the Colorado plan be added as the preferred alternative in the DLUPA/EIS. As a less-preferred alternative, site specific conservation measures from the Colorado Plan should be incorporated into Alternative D.
2. In considering conservation measure specific to coal mining in the DLUPA/EIS, acknowledgement should be given to the fact that mining disturbances are temporary. The LUP should also consider the demonstrated fact that a good portion of the reclaimed lands at Northwest Colorado coal mining operations are better habitat for GrSG than the original native habitat. Reclaimed lands are often more open than former native mountain brush habitats with a greater percentage of sagebrush steppe habitat. Reclaimed habitats typically contain excellent plant community diversity conducive to potential GrSG life cycle habitat for lekking, nesting, brood-rearing and in some cases, wintering.

3. We are concerned that the DLUPA/EIS document is overly reliant on the National Technical Team (NTT) Report for Alternatives B, C and D. The NTT report gives broad, inflexible, one-size-fits-all guidelines for all Western U.S. GrSG habitat regions. NTT recommendations for disturbance caps, surface occupancy restrictions, leasing restrictions and many other issues completely ignore federal land management agency mandates for multiple use. Further, the NTT report virtually ignores socioeconomic impacts and does not reflect site specific conditions in northwest Colorado.

4. Socioeconomic impacts of GrSG conservation measures in NW Colorado is lacking in the DLUPA/EIS document. There is essentially no discussion about employment impacts from GrSG conservation measures, while the negative impacts of management restrictions and closures in the report are greatly underestimated. The impact of this proposal on the city of Craig and Moffat County needs to be considered much more closely. The Craig/Moffat County community depends almost entirely on energy development, farming and ranching activities and hunting revenue for its economic and social well-being. Federal mandates, such as the current DLUPA/EIS document, that severely restrict these activities could have a devastating impact on nearly every aspect of economic and social life in the community and needs to be more thoroughly evaluated and considered.

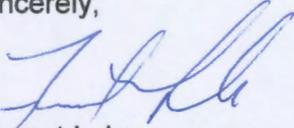
5. Overly restrictive buffer zones will inhibit economic activity in northwest Colorado. In particular the four mile buffer around GrSG leks is excessive. It lacks any solid scientific underpinning and ignores the fact that in all likelihood much of the habitat within the four mile buffer will not be sagebrush habitat conducive to any GrSG life cycle element. Moreover, the DLUPA/EIS document fails to include any method of monitoring or documenting habitat quality within restriction areas, further exacerbating the arbitrary nature of the restriction.

6. Disturbance cap requirements are unworkable and without any scientific basis. In particular, a 30 percent total disturbance cap that includes loss of sagebrush from all causes (e.g., wildfire, agriculture, vegetation treatments) is very concerning. Large wildfires, typically caused by lightning strikes, are a fact of life on northwest Colorado sagebrush dominated rangelands. Unpredictable wildfires that use up all available disturbance cap buffer makes resource development planning nearly impossible and is patently unfair. At the very least an emergency provision for large wildfires that would allow existing resource development plans to continue should be included in the DLUPA/EIS. It is also unfair to operators on federal leases that disturbance on private land is counted against the cap, yet mitigation on private land does not create cap space. Mitigation on private land should be included as part of the plan. Finally, a method to monitor and document disturbance as related to disturbance caps is nonexistent in the plan and will certainly become a continuous source of legal contention.

In conclusion, we respectfully request that our comments be considered as this process moves forward. We feel the DLUPA/EIS goes beyond what is necessary to keep the northwest Colorado GrSG population from being listed by USFWS and that there needs to be a better balance between existing multiple use mandates and GrSG conservation efforts.

We stand ready to respond to any questions that you may have.

Sincerely,

A handwritten signature in blue ink, appearing to read "Forrest Luke", is written over the typed name.

Forrest Luke
Manager of Environmental and External Affairs
Trapper Mining Inc.
970-826-6140