RECEIVED
BUREAU OF LAND MGMT.
GRAND JCT., CO

2013 NOV 22 PM 12: 59

November 18, 2013

Erin Jones,
Northwest Colorado Project Leader.
BLM Greater Sage Grouse EIS
BLM
2815 H Road
Grand Junction, CO 81506

Dear Mrs. Jones,

There are a number of provisions contained within the draft sage grouse EIS that concern me. First, I do not feel as though the NTT and Cobb studies cited within the EIS meet the rigorous standards necessary for forming the basis of such a critical and wide-reaching study. To my knowledge, neither study has been properly peer reviewed, and the scientists involved have not been identified. These are two crucial elements of transparency and accountability necessary for any study whose conclusions have the potential for cause great economic harm.

Second, the disturbance caps called for in the description of the alternatives, and in Appendix F, are too broad in scope, and will unnecessarily limit economic activity on public lands, which make up a considerable amount of the land base in northwest Colorado. Not only will the individual caps limit activity, but the cumulative effect of a 30% regional disturbance cap will compound the impacts.

Third, the buffer zones that the plan calls for around sage grouse leks, that set NSO stipulations for fluid mineral development, will further restrict development, and in any case, are not justified by any of the available data.

Finally, and most important, the EIS was developed with hardly any meaningful input from the various Cooperating Agencies. When input was offered, they were told to only work within the confines of the NTT study. No consideration was given to the fact that these agencies might have a perspective and experience that could be helpful in the process, and avoid the contentions that often arise when a proper balance between ecological preservation and economic need is not arrived at.

For these reasons, I recommend that the EIS be re-done, and that greater care be taken next time regarding the scientific process, and the inclusion of local governments.

Sincerely,

Shawna Grieger
642 Monarch Court
Grand Junction, CO 81504

RECEIVED
BUREAU OF LAND MGMT.
GRAND JCT., CO

2013 NOV 22 PM 1:00

October 22, 2013

BLM Greater Sage-grouse EIS
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

ATTN: Erin Jones, Northwest Colorado Sub-Region Project Lead

Re: Northwest Colorado Greater Sage Grouse Draft LUPA/EIS

Ms. Jones,

It is my opinion that this draft LUPA/EIS fails to meet several criteria for which such a policy document should be judged:

1) The EIS fails to meet adequate scientific standards. Many of the most contentious proposals in the document are not justified or supported by available data. The Priority Habitat designations within the EIS, for example, are much broader and encompass far more acreage than studies conducted by competent 3rd parties commissioned by Garfield County have shown to be the case. Likewise, the proposed 4-mile buffer around lek sites is not backed up by credible data. In fact, none of the major actions prescribed by the EIS appear to be in any way supported by science Whatever the BLM proposes, it should be properly and thoroughly documented, and made available for public scrutiny.
2) The EIS fails to properly account for the economic damage that the adoption of any one of the "Action Alternatives" would do to the northwest Colorado region. This region is heavily dependent on mining, oil and gas exploration and development, grazing, and other resource-based activities, all of which will be severely restricted by the disturbance caps, buffer zones, and other land restrictions laid out in the EIS.
3) The recommendations and input of the various cooperating agencies, including local county and municipal governments, were not taken into account, and actually ignored in favor of a scientifically dubious NTT report. The cooperators are the people and organizations that are closest to the land, who know what works and what does not, and have successfully balanced environmental and economic concerns within their jurisdictions for many, many years. To disregard their experience and input is irresponsible of the BLM.

For these reasons, I hope that your agency will go back to the drawing board, address these deficiencies, and prepare a more flexible, realistic plan that incorporates the needs of northwest Colorado.

Sincerely,

Zuzana Starr

Zuzana Starr
1897 Anvil View
Rifle, CO 81650

RECEIVED
BUREAU OF LAND MGMT.
GRAND JCT., CO

2013 NOV 22 PM 1:01

October 22, 2013

BLM Greater Sage Grouse EIS
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

Mrs. Erin Jones,
Northwest Colorado Sub-Region Project Lead

Dear Mrs. Jones,

I would like to make the following comments on the Draft Land Use Plan and Environmental Impact Statement for Northwest Colorado:

First, the disturbance caps included in all of the action alternatives are too broad, and inconsistent with the continuation of the principal economic activities of northwest Colorado. Either a 3% or a 5% disturbance cap would severely restrict agricultural, energy, infrastructure, and other projects vital to the economic well-being of the people in this region. Moreover, the range of area that the disturbance cap is applied to exceeds that which actually supports sage grouse. Sage grouse habitat is not continuous, and much more fragmented than this EIS or the reports it relies on would indicate. Therefore, applying disturbance caps over such a broad area makes little sense, especially given the economic harm that will result.

Second, the 4-mile buffer zone that is proposed to be established around leking sites, also does not make much sense, in light of the available science. A four mile zone is a considerable amount of land, and such an extensive buffer is not required to protect the sage grouse. It would help if the BLM could produce some objective, peer-reviewed study that could justify the imposition of a 4-mile buffer.

Finally, there are several existing regulatory efforts underway in the state of Colorado to address the issues identified in the EIS, including programs by Colorado Parks and Wildlife, Garfield County and other local governmental entities, and the private sector. These efforts were neither acknowledged nor taken into account in the drafting of this EIS. Recognizing these efforts, and coordinating with them, could have prevented the BLM from proposing a number of measures that will cause great harm to the people and economic health of northwest Colorado.

In closing, I would like to say that I cannot support any of the action alternatives, given that so much seems to have been overlooked, including the economic realities of the region.

Yours sincerely,

Kent Jolley
832 Canyon Creek Dr
Glenwood Springs, CO 81601

RECEIVED
BUREAU OF LAND MGMT.
GRAND JCT., CO

2013 NOV 22 PM 1:01

10/22/2013

BLM Greater Sage Grouse EIS
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

Dear BLM Staff,

I am extremely disappointed in the Draft Land Use Plan and EIS for managing sage grouse habitat in Northwest Colorado. The draft was evidently put together with little or no input from local governments and organizations, resulting in a proposal that is economically disastrous, and not based in scientific fact.

The reports used by your agency to draft the EIS came almost exclusively from the National Technical Team (NTT), many of whose studies contradict other, more reliable, peer-reviewed studies done into Greater Sage Grouse habitat in the northwest of Colorado. When Garfield County expended their own time and resources to pull together this data, their efforts were discounted. The NTT findings seem to be more in line with an anti-development agenda, than with objective fact that ought to be used when drafting such a wide-ranging document as this.

Specifically, why is a four-mile buffer being established around lek sites? Where is the scientific evidence to suggest that this extreme a measure is necessary? Where is the data to support a 3 or 5 percent disturbance cap – or the overall 30 percent disturbance cap for the whole region? For that matter, where is the data to support the maps used in the EIS, and the extent of priority habitat designated?

The process should be far more transparent than it has been; the names of the scientists involved in preparing the NTT should be released, and full disclosure of the process made available to the public.

These proposed Land Use Plan Amendments will have significant impact on the region. It is therefore incumbent on the BLM to do its due diligence in assessing the data, and their sources, and to make the process as transparent and open as possible. Seriously considering the work done by Garfield County would be a good place to start.

Cordially,

Shirley Starr

Shirley Starr
2584 Odin Dr
Silt, CO 81652

RECEIVED
BUREAU OF LAND MGMT.
GRAND JCT., CO

2013 NOV 22 PM 1:01

10/22/13

BLM Greater Sage-grouse EIS
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

Ref: Sage Grouse EIS

To whom it may concern:

All of the proposed alternatives within the Northwest Colorado Greater Sage Grouse Draft Land Use Plan Amendment and Environmental Impact Statement fall well short of being suitable for the region. For instance, the disturbance caps being imposed by all three action alternatives are far too broad and inflexible to be compatible with the economy of northwest Colorado. While Alternative D does increase the cap to 5%, that will still negatively impact economic activity in the region, especially given the way it is described in Chapter 2. Not only is the Preliminary Priority Habitat designation assigned to an excessive amount of acreage, but the cap is applied to areas not currently supporting sagebrush, but with the potential to do so. This injects an element of arbitrariness that is not supported by any of the data.

In addition, the caps are cumulative over the entire region, and the total disturbance allowed is 30% -- as the EIS itself states, there will be a rush to get projects approved before hitting the cap ceiling. Clearly the BLM knows full well that this arbitrary disturbance cap will mean that a considerable number of agricultural, mining, oil and gas, infrastructure, communications, and other projects will not be permitted. This will have a devastating impact on the local economy, made all the more unpalatable because of the lack of scientific evidence to back up the need for such drastic restrictions.

Finally, granting exceptions to the cap will be contingent upon the applicant providing his or her own research to support the position that the applicant's project will not adversely harm Sage Grouse habitat. This research should be done by the BLM, not left up to individual farmers, ranchers, and business owners.

This EIS, and the NTT study on which it is based, is essentially nothing more than a rubber stamp of an ideological position concerning extreme environmental policies and that is adversarial towards mining, and other energy development. The BLM should revisit the entire process, and apply a more objective eye to it, one that takes into account the solid work done by many of the cooperating agencies, most notably Garfield County, who will be directly impacted by the resulting decision.

Cordially,

Kelly Couey
Carrie Couey

Kelly and Carrie Couey
6275 County Rd 315
Silt, CO 81652

RECEIVED
BUREAU OF LAND MGMT.
GRAND JCT., CO

2013 NOV 22 PM 1:00

October 23, 2013

BLM Greater Sage Grouse EIS
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

ATTN: Erin Jones
Re: NW Colorado GRSG Draft LUPA/EIS

Dear Mrs. Jones,

I would first like to say that this LUPA/EIS is a very disappointing effort. Considerable work has been done by various stakeholders in the region that should not be ignored, yet has been. Many Colorado State agencies, local governments, and private reclamation companies have contributed a substantial amount of time, effort and resources towards the goal of protecting the Greater Sage-grouse and its habitat, in a manner that did not unduly interfere with the right of Coloradans to earn a living. Garfield County in particular enlisted some of the most reputable experts in the fields of biology and ecology, and the most reliable scientific models to prepare a far more adequate plan, which has unfortunately been largely dismissed by your agency. With so much at stake, it bewilders me why the BLM would not welcome the cooperation and assistance of other agencies, especially those closest to the issue.

As for the specifics of the draft, there are a number of items to which I object. The first concerns the disturbance caps, which are included to some degree in each of the "action" alternatives. Not only are the 3 and 5% caps (as described in alternatives B/C, and D respectively,) overly rigorous, and applied to an unreasonable amount of land, but the overall 30% cap will severely impede economic development in the region, development that would not adversely affect sage grouse habitat.

The same concerns exist for the 4 mile buffer zones proposed for certain types of habitat. Again, these buffer zones exclude way more land from activity than is justified to protect either the Greater Sage Grouse or its habitat.

It is no secret that the economy of northwest Colorado is energy-based, and that mining, and drilling for oil and gas are critical to the economic survival of the region. We all have a vested interest in protecting our wildlife and their habitat, but there is a right and wrong way to go about it, and by ignoring the efforts and constructive input of local agencies, the BLM is going about this particular project the wrong way.

Sincerely,

Raelyn Westley
P.O. Box 1843
Glenwood Springs, CO 81602