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November 19th, 2013

Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

RE: Northwest Colorado Greater Sage Grouse Draft LUPA/EIS

Dear BLM staff,

The Western Colorado Jobs Alliance is categorically opposed to the implementation of any of the Action Alternatives described in the Draft EIS. Specifically, our objections are:

1) The disturbance caps, including the marginally more lenient 5% cap in Alternative D, are overly broad, and cover an unreasonably large amount of land. Not all of the land that you have designated as Preliminary Priority Habitat is actually supportive of sage grouse habitat in reality, and therefore should not be subject to these disturbance caps. Moreover, the cumulative effect of the disturbance caps, culminating in a 30% cap for the entire planning region, will, as you admit in the EIS, limit economic activity to such an extent that there will be a rush to get projects approved before the cap is reached. What will happen to those projects that cannot go ahead because of this arbitrary and capricious cap? Jobs will be lost for the sake of a mitigation measure that has no basis in fact.

2) The oil and gas industry is being specifically and unfairly targeted. Looking over the descriptions of the Action Alternatives in Chapter 2, we cannot find any other industry that is subject to the NSO (No-Surface-Occupancy) stipulations that are prescribed for fluid minerals. This will compound the job losses caused by the over-reaching disturbance caps.

3) Finally, the opinions and suggestions of local towns and counties were not taken seriously, as evidenced by the relegation of the Garfield County Sage Grouse plan to the Appendix, rather than being offered as a separate, viable alternative. Also, the existing efforts by various state,

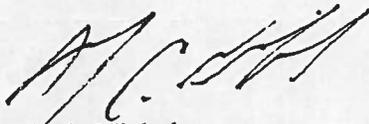
Western Colorado Jobs Alliance
2536 Rimrock Avenue, Suite 400-274, Grand Junction, CO 81505

local, and private-sector entities at protecting greater sage grouse habitat were either overlooked, or ignored in the same manner as the majority of cooperating agency input was.

Had hard data been utilized, and the suggestions of local communities and experts been accepted, a plan could have been developed that meets the needs of all concerned parties – the sage grouse habitat would be protected, and the oil and gas industry – along with others – would be allowed to continue to thrive, rather than be capriciously attacked.

Oil and gas is one of, if not the, most important industries in this region, and hundreds of jobs, livelihoods, and futures are riding on your office making appropriate and reasonable decisions.

Signed,

A handwritten signature in black ink, appearing to read 'A. Nickel', written in a cursive style.

Andy Nickel
Director