

August 13, 2012

Helen Hankins  
Bureau of Land Management  
Colorado State Director  
2850 Youngfield Street  
Lakewood, Colorado 80215-7093

**Re: BLM's Greater Sage-Grouse Environmental Impact Statement**

Dear Director Hankins,

The undersigned local governments have been participating in the regular Greater Sage-Grouse Cooperating Agency meetings that the Bureau of Land Management (BLM) hosts. We are particularly appreciative of the magnitude of the planning effort BLM is directed to undertake. We are even more appreciative of the candid straight-forward information BLM has shared during Cooperating Agency meetings. Although we plan to continue participating in the process, we are deeply concerned the process does not accommodate the mandates that BLM consider the views of local governments as envisioned under the Federal Land Policy and Management Act (FLPMA) or the National Environmental Policy Act (NEPA).

Since before the first Cooperating Agency meeting May 18, 2012, many participants have publically raised concerns about the BLM giving little deference to existing sage grouse planning documents which we have spent years developing. We have also commented on the too-narrow range of alternatives which BLM will be analyzing, and specifically that the alternatives BLM is considering do not balance the basic need of grouse conservation and social and economic growth within our jurisdictions.

As various situations have arisen in Cooperating Agency meetings, it is apparent that BLM is bound by parameters that reflect advance decisions by BLM on the preferred alternative while not addressing the scientific controversies regarding the status of sage grouse populations. These parameters are also not consistent with the needs within our respective communities. From the outset we believed the National Technical Team (NTT) Report supported an extreme grouse-conservation alternative, warranting analysis as an extreme alternative. Then a few weeks ago, we learned that the Washington Office of BLM had directed BLM to consider an even more conservation-oriented alternative, one that makes the NTT report look "middle of the road." When local governments requested an equally balanced alternative providing for

the current development of oil and gas, recreation uses, and grazing resources, we were constrained to modifying the NTT Report. This direction flies in the face of NEPA's mandate that BLM consider a range of reasonable alternatives. A balanced use alternative should be among those analyzed in the Draft Environmental Impact Statement. In addition, the NTT report focuses on limiting ground disturbance to a 3% threshold in primary grouse areas which will drastically affect the economies of NW Colorado. We do not support BLM Washington defining what constitutes disturbance in solely Washington driven committees, rather, BLM should use its Cooperating Agencies to determine disturbance definitions.

BLM's parameters directed from the Washington BLM Office provide little opportunity for meaningful input from local governments. These limits ensure that BLM does not address consistency with local government plans, the broader multiple use mandates of FLPMA and other federal laws, use only peer-reviewed quality data, or explore the scientific controversies regarding conservation of the sage grouse. We are even more concerned that Washington has already determined the preferred alternative that BLM must select, hence the limited latitude given to the Cooperating Agencies.

In addition to the limitations BLM has placed upon the land use planning process, we are deeply concerned about the unrealistic timeframe for completing the Sage Grouse Environmental Impact Statement. A Draft Environmental Impact Statement is scheduled to be published by the spring of 2013, across Northwest Colorado, much less 11-western states with insufficient time to meaningfully involve the stakeholders. The short time-frames will drastically limit the quality of the document, and more importantly the level of protection the sage grouse receives. We fully recognize these timeframes can be traced back to a 2011 court decision dictating such timeframes, but nevertheless find them ridiculously burdensome, and impossible for BLM to adequately address such a complex issue.

We recommend first that BLM return this process to what the law requires, which is close coordination with state and local governments. Second, BLM must develop a balanced-use alternative that includes and reflects state and local government conservation efforts, not just federal agency viewpoints. Third, BLM needs to secure an extension of time, because the EIS

will be challenged and short-cutting the process will only end in failure, and finally BLM must immediately involve the Cooperating Agencies in defining what constitutes ground disturbance.

Sincerely,



Garfield County Commissioners



Moffat County Commissioners



Jackson County Commissioners



Rio Blanco County Commissioners



DOUGLAS B. MONSAL  
CHAIRMAN  
Hout County Commissioners 2 of 3 BOCC  
SUPPOT LETTER



Scott A. Robertson  
Douglas Creek Conservation District



White River Conservation District

- CC: Jim Cagney, BLM Regional Director  
John Hickenlooper, Governor of Colorado  
Congressman Scott Tipton  
Senator Mark Udall  
Senator Michael Bennet  
Senator Jean White  
Representative Randy Baumgardner