



March 21, 2013

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

Jim Cagney, NW District Manager
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

RE: Garfield County Greater Sage-Grouse Conservation Plan

Dear Director Hankins and Mr. Cagney,

On Monday, March 18th, 2013, the Garfield County Board of County Commissioners (the Board) unanimously approved the Garfield County Greater-Sage Grouse Conservation Plan (the Plan) which is memorialized in Resolution 2013-23. This Plan is a refinement of the **Parachute – Piceance – Roan Conservation Plan** (PPR Plan) and now guides all plans, policies, conservation measures and best management practices for the Greater Sage-Grouse (sage-grouse) in Garfield County.

As is stated in the plan:

“The purpose of the Plan is to provide private and public land owners with land management principles, policies, incentives, and best management practices based on the best available science that are tailored to fit Garfield County’s unique landscape and habitat characteristics for the betterment of the species.”

The Board placed considerable time and resources in developing this Plan to ensure that the policies within are based on the best available science and are relevant to Garfield County's unique topography. An extensive and detailed mapping project was undertaken to ensure that all areas that have the characteristics of suitable habitat are clearly identified, and those that do not meet these requirements are also easily identified.

Having this detailed knowledge about the habitat allowed us to design specific and meaningful policies that will benefit our unique peripheral population of sage-grouse. More than that, a fundamental approach inherent in our Plan addresses the 'cause and effect' mechanisms that underlie each threat to sage-grouse, rather than relying on one-size-fits-all set of regulations and blanket setback distances. By this letter, we specifically ask that you 1) use this superior and locally appropriate data as you move forward in preparing the Northwest Colorado Greater Sage-Grouse Environmental Impact Statement (EIS) and 2) incorporate the sage-grouse conservation measures from the Plan into your Resource Management Plans as they apply in Garfield County.

Enclosed is a copy of the Plan for your review. We request that this be included as the preferred alternative for the Garfield County portion of the EIS because the policies within are best suited to manage the habitat in Garfield County. As has been discussed before, we understand that your obligation under the National Environmental Policy Act (NEPA) is to resolve conflicts between your plans and our policies, and if you are unable to do so then our position must be included in the analysis in the form of an alternative so that the public and decision makers can properly analyze and comment on *all* the reasonable alternatives.

To ensure inclusion of this alternative in the internal review of the Draft EIS, we have also inserted our policies into your alternatives table format (attached to this letter) to make it easier for you to incorporate our plan directly into your draft analysis before it is released to the public.

We are confident that the principles and policies within our Plan will sustain any challenge as they were developed relying on the latest advancements in technology and on the most relevant and best available science as applied to our unique terrain.

One of the Board's key concerns was to answer the question you raised at the last Coordination meeting, which was how does the BLM implement "voluntary" measures and still provide regulatory assurance? You indicated that while you agreed with many of the provisions of the PPR Plan, its voluntary implementation was problematic. This question, in part, caused the Board to develop this refinement to the PPR Plan. We have addressed this issue specifically in the Plan by making the policies and conservation measures mandatory on federal lands.

As you will see, once you review the detailed maps upon which this Plan is based, the actual suitable habitat is not 220,000+/- acres as identified on the coarser maps produced by Colorado Parks and Wildlife. Rather, suitable habitat is extremely patchy, non-contiguous and only totals

approximately 15,000 acres. Because of the unique nature of the suitable habitat, we find it to be reasonable to employ an avoidance policy of the surface areas of the suitable habitat on federal lands.

Another key concern for the Board was ensuring that this Plan could provide the “regulatory assurance” the U.S. Fish and Wildlife Service will be seeking as they determine whether or not the sage-grouse should come under the federal protection of the Endangered Species Act. To provide this assurance, the Plan will be implemented through the Coordination process and serve as the comprehensive plan that all other measures work to be consistent with. We recognize our unique position of being able to ensure that all the different managers of the species and its habitat coordinate with Garfield County. We have made our commitment to coordinate with your agency as well as the others clear. Coordination can provide the regulatory assurance as you and the other agencies involved in this issue fulfill your duties in accordance with the law.

We are available to answer any questions you may have about the Plan and will be happy to assist you as you consider how the Plan will be treated in your NEPA analysis. We are also looking forward to our April 4th Coordination meeting where we can discuss in greater detail the provisions within the Plan once you have had the opportunity to thoroughly review its contents.

Very truly yours,



John Martin, Chairman
Garfield County Board of County Commissioners

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Frank Hutfless, Garfield County Attorney
Andrew Gorgey, Garfield County Manager
Fred A. Jarman, Director, Garfield County Community Development Department

Attachment(s) Garfield County Greater Sage-Grouse Conservation Plan
EIS Alternatives Table including 'Garfield County Alternative'