



April 19, 2013

Erin Jones, NEPA Coordinator
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

RE: Garfield County comments on the Preliminary Draft RMPA/EIS for Local/State Office Review

Dear Erin,

Undercover of this letter you will find comments prepared by Garfield County on the Preliminary Draft Resource Management Plan Amendment / Environmental Impact Statement for the Greater Sage-Grouse in Northwest Colorado.

Please do not hesitate to contact me if you have any questions or comments.

Very truly yours,

A handwritten signature in blue ink, appearing to be 'Fred A. Jarman', is written over a horizontal line. The signature is stylized and includes a star-like symbol.

Fred A. Jarman, AICP
Director, Garfield County Community Development Department
970-945-8212
fredjarman@garfield-county.com

cc Garfield County Commissioner Tom Jankovsky
Garfield County Attorney, Frank Hutfless

To BLM and Forest Service Local/State Office Reviewers & Cooperating Agencies:

The **Preliminary Draft RMPA/EIS** is intended for internal review by the BLM Field Offices, BLM Colorado State Office, and Forest Service from March 21 – April 4, 2013, and by Cooperating Agencies from March 21 – April 18, 2013. (Please do not distribute.)

- Please complete the MSWord comment matrix (provided at the end of these instructions) by saving this file with a new file name including your last name (for example, name your comment matrix “NWCO_Cmts_PDRMPA_201303_Adams.docx”), and then fill out your comments on the document.
- Email your comments on the Preliminary Draft RMPA/EIS for Local/State Office Review by close of business **Thursday, April 4, 2013 (BLM and Forest Service reviewers)** or **Thursday, April 18, 2013 (Cooperating Agencies)** to Erin Jones of the Northwest Colorado District (erjones@blm.gov).
- Contact Erin Jones (970) 244-3008 or Bridget Clayton (970) 244-3045 with questions.

- As defined in the acronyms and abbreviations list in the document:
 - The **planning area** refers to the BLM Northwest Colorado District boundary, composed of all lands regardless of ownership.
 - The **decision area** refers only to BLM- and Forest Service-administered public lands (and federal split-estate minerals) in the planning area (BLM Northwest Colorado District) that are designated as preliminary priority habitat (PPH), preliminary general habitat (PGH), or linkages.
- There are still some outstanding calculations noted and/or highlighted with **xx's** or **notes to BLM** throughout the document. These are in progress by the BLM.

Commenting:

For each comment, please fill in the following information under the appropriate column heading in the matrix:

- ✓ Page number, line number, or table number on which you are commenting. **The page and line numbers in the PDF file or paper copies MUST be used.**
- ✓ Your comments:
 - **Your comments must be specific and provide exact changes to the text.** Please be unambiguous, clear, and directive, with exact wording changes stated. Ambiguous comments, such as “What?,” “Poor,” or “Is this right?,” are not helpful and will not be considered.
 - If you have the same comment more than once, do not refer back to a previous comment number. Instead, please copy and paste your comment to a new row in the matrix and provide the specific page number, etc.
 - If you need additional space for comments, click in the table cell where you would like to comment, select the *Table* menu, *Insert*, and either *Rows Above* or *Rows Below*.

**BLM – NORTHWEST COLORADO DISTRICT
RESOURCE MANAGEMENT PLAN AMENDMENTS AND ENVIRONMENTAL IMPACT STATEMENT**

Comments on Preliminary Draft RMPA/EIS for Local/State Office Review (March 20, 2013)

Cmt #	Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M¹	Response / How Resolved (Reviewers: Leave this column blank)
1.	1-20	29	Fred Jarman	Garfield County	Add the following: " <u>Garfield County Greater Sage-Grouse Conservation Plan.</u> "		
2.	3-79	26	Fred Jarman	Garfield County	Please provide full citation for this reference		
3.	3-87	8	Fred Jarman	Garfield County	Should read...mitigation measures could be modified <u>shall be allowed</u> on a case-by-case for avoidance		
4.	3-117	26	Fred Jarman	Garfield County	Please define the word "temporary"		
5.	4-68	17	Fred Jarman	Garfield County	There is nothing in here from Dr. Walker's work on distance from forests as a key criterion for defining suitable habitat due to avian predation....		
6.	2-158		Fred Jarman	Garfield County	Table 2-7: In each case for Exception, Modification, and Waiver, there needs to be text added after the first line that reads: The Authorized Officer, <u>based on publically available criteria</u>		

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7.	2-155		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Habitat Restoration as a new NTT No. 98: <u>For areas within the political boundaries of Garfield County, only the following shall apply: The naturally patchy habitat in the Plan Area requires that habitat restoration projects be planned accordingly and that creating large contiguous landscapes of sagebrush is not consistent with the plant communities in the Plan Area.</u></p> <p><u>Encourage habitat restoration projects on private land. Request that private landowners report annually on the progress of restoration efforts (providing spatial data associated with an API number, date, and status of restoration), so the County may track disturbed vs. restored acreages in and near Suitable Habitat.</u></p> <p><u>Recognizing that local conditions in the Plan Area differ from those range-wide for sage-grouse, the County's mapped Suitable Habitat will be used for quantifying habitat conservation objectives of no net loss of Suitable Habitat (excluding that resulting from wildfire and temporary disturbances, as permitted).</u></p> <p><u>Require the use of native plant species for restoration based on availability, and probability of successful establishment.</u></p> <p><u>Encourage local private landowners to share information among themselves and the County on restoration design and strategies to obtain favorable outcomes.</u></p>		

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8.	2-150		Fred Jarman	Garfield County	Add the following text under Alternative D for ES&R in NTT No. 87: <u>For areas within the political boundaries of Garfield County, only the following shall apply:</u> <u>1) Follow the County’s habitat restoration policy in developing an emergency rehabilitation plan for temporarily disturbed areas within suitable habitat.</u> <u>2) Coordinate with appropriate agencies in developing and implementing rehabilitation plans.</u> <u>3) Coordinate with private landowners and leaseholders to integrate their expertise and knowledge of local conditions into rehabilitation plans.</u>		
9.	2-149		Fred Jarman	Garfield County	Add the following text under Alternative D for Fire Operations in NTT No. 85 and 86: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), prioritize suppression immediately after firefighter and public safety. Consider GRSG habitat requirements in conjunction with all resource values managed by the BLM, and give preference to grouse habitat unless site specific circumstances warrant an exemption.</u>		
10.	2-148		Fred Jarman	Garfield County	Add the following text under Alternative D for Fuels Management in NTT No. 83 and 84: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), during fuels management project design, consider the utility of using livestock to strategically reduce fire fuels (Diamond et al. 2009), and implement grazing management that will accomplish this objective (Davies et al. 2011 and Launchbaugh et al 2007). Consult with ecologists to minimize impacts to native perennial grasses consistent with the objectives and conservation measures of the range management policy.</u>		

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11.	2-147		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Fuels Management in NTT No. 81 and 82: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Recognizing that local conditions differ from those range-wide for sage-grouse, the County's mapped Suitable Habitat will be used for quantifying habitat conservation objectives of no net loss of Suitable Habitat (excluding that resulting from wildfire and temporary disturbances, as permitted).</u></p> <p><u>Require the use of native plant species for restoration based on availability, and probability of successful establishment.</u></p>		
12.	2-147		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Fuels Management in NTT No. 80: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Any grazing restrictions or conservation measures that are put in place through a grazing permit shall be based solely on the conditions and activities specific to that permitted grazing allotment.</u></p>		

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13.	2-146		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Fuels Management in NTT No. 80: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), All federal and state agencies with management responsibilities in the plan area for the species and/or its habitat shall provide the County with an annual update of the monitoring programs they have in place, data collected and specifics about their collection protocols. These agencies will inform the County of proposed research projects and allow for the County's input and collaboration prior to implementation.</u></p> <p><u>All data shall be collected according to the guidelines issued under the Information Quality Act.</u></p> <p><u>All data that is gathered in the Plan Area shall be shared with the County in a timely manner, and supplied to the County regardless of its state of completion at the formal request of the County.</u></p> <p><u>Private landowners are also encouraged to monitor and share data collected on private property with the County.</u></p> <p><u>All data that is shared with the County that is not public information will be treated as confidential and used by the County only to help inform its policies and best management practices.</u></p>		

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14.	2-145		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Fuels Management in NTT No. 76-78: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Provide technical (GIS) support that can be used by landowners for voluntary fuels management that is consistent with sage-grouse habitat protection and enhancement.</u></p> <p><u>Work with landowners to design fuels management projects in Suitable Habitat to strategically and effectively reduce wildfire threats.</u></p>		

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15.	2-144		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Fuels Management in NTT No. 75: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH),</u></p> <p><u>A. Fuels Management Policy</u></p> <p><u>1) Provide technical (GIS) support that can be used by landowners for voluntary fuels management that is consistent with sage-grouse habitat protection and enhancement.</u></p> <p><u>2) Work with landowners to design fuels management projects in Suitable Habitat to strategically and effectively reduce wildfire threats. Garfield County Greater Sage-Grouse Conservation Plan Page 36</u></p> <p><u>3) During fuels management project design, consider the utility of using livestock to strategically reduce fire fuels (Diamond et al. 2009), and implement grazing management that will accomplish this objective (Davies et al. 2011 and Launchbaugh et al 2007). Consult with ecologists to minimize impacts to native perennial grasses consistent with the objectives and conservation measures of the range management policy.</u></p> <p><u>B. Emergency Stabilization and Rehabilitation Policy</u></p> <p><u>1) Follow the County's habitat restoration policy in developing an emergency rehabilitation plan for temporarily disturbed areas within suitable habitat.</u></p>		

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16.			Fred Jarman	Garfield County	<u>2) Coordinate with appropriate agencies in developing and implementing rehabilitation plans.</u> <u>3) Coordinate with private landowners and leaseholders to integrate their expertise and knowledge of local conditions into rehabilitation plans.</u>		

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17.	2-144		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Split Estate Minerals in NTT No. 73 and 74: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Close suitable habitat as determined by the County's GIS mapping to future mineral leasing surface disturbance unless the resource cannot be extracted without minimal surface disturbance. In this case, the Best Management Practices will be followed and if necessary mitigation utilized to ensure a no net loss to sage grouse habitat and no deleterious demographic effect on the population.</u></p> <p><u>All active Leks identified outside of suitable habitat shall have a 0.6 mile NSO for all non-functional surface disturbance as defined in the Colorado State Plan. Exceptions for allowing functional disturbance within the 0.6 mile NSO may be allowed for exceptional or unique topography or other non-contributing habitat aspects or circumstances that will not adversely impact sage-grouse. If the resources cannot be accessed without disturbing the active Lek NSO habitat, then Best Management Practices will be followed and necessary mitigation utilized to ensure a no net loss to sage grouse potential habitat and no deleterious demographic effect on the population.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		

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18.	2-143 and 2-144		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Salable Minerals in NTT No. 71 and 72: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH),</u> <u>Close suitable habitat as determined by the County's GIS mapping to future mineral leasing surface disturbance unless the resource cannot be extracted without minimal surface disturbance. In this case, the Best Management Practices will be followed and if necessary mitigation utilized to ensure a no net loss to sage grouse habitat and no deleterious demographic effect on the population.</u></p> <p><u>All active Leks identified outside of suitable habitat shall have a 0.6 mile NSO for all non-functional surface disturbance as defined in the Colorado State Plan. Exceptions for allowing functional disturbance within the 0.6 mile NSO may be allowed for exceptional or unique topography or other non-contributing habitat aspects or circumstances that will not adversely impact sage-grouse. If the resources cannot be accessed without disturbing the active Lek NSO habitat, then Best Management Practices will be followed and necessary mitigation utilized to ensure a no net loss to sage grouse potential habitat and no deleterious demographic effect on the population.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		

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19.	2-143		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Non-Energy Leasable Minerals in NTT No. 69 and 70: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Close suitable habitat as determined by the County's GIS mapping to future mineral leasing surface disturbance unless the resource cannot be extracted without minimal surface disturbance. In this case, the Best Management Practices will be followed and if necessary mitigation utilized to ensure a no net loss to sage grouse habitat and no deleterious demographic effect on the population.</u></p> <p><u>All active Leks identified outside of suitable habitat shall have a 0.6 mile NSO for all non-functional surface disturbance as defined in the Colorado State Plan. Exceptions for allowing functional disturbance within the 0.6 mile NSO may be allowed for exceptional or unique topography or other non-contributing habitat aspects or circumstances that will not adversely impact sage-grouse. If the resources cannot be accessed without disturbing the active Lek NSO habitat, then Best Management Practices will be followed and necessary mitigation utilized to ensure a no net loss to sage grouse potential habitat and no deleterious demographic effect on the population.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		

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20.	2-141 and 2-142		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Locatable Minerals in NTT No. 65 through 68: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH),</u></p> <p><u>Close suitable habitat as determined by the County's GIS mapping to future mineral leasing surface disturbance unless the resource cannot be extracted without minimal surface disturbance. In this case, the Best Management Practices will be followed and if necessary mitigation utilized to ensure a no net loss to sage grouse habitat and no deleterious demographic effect on the population.</u></p> <p><u>All active Leks identified outside of suitable habitat shall have a 0.6 mile NSO for all non-functional surface disturbance as defined in the Colorado State Plan. Exceptions for allowing functional disturbance within the 0.6 mile NSO may be allowed for exceptional or unique topography or other non-contributing habitat aspects or circumstances that will not adversely impact sage-grouse. If the resources cannot be accessed without disturbing the active Lek NSO habitat, then Best Management Practices will be followed and necessary mitigation utilized to ensure a no net loss to sage grouse potential habitat and no deleterious demographic effect on the population.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		

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21.	2-136 to 2-141		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Solid Minerals - Coal in NTT No. 62 through 64: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Close suitable habitat as determined by the County's GIS mapping to future mineral leasing surface disturbance unless the resource cannot be extracted without minimal surface disturbance. In this case, the Best Management Practices will be followed and if necessary mitigation utilized to ensure a no net loss to sage grouse habitat and no deleterious demographic effect on the population.</u></p> <p><u>All active Leks identified outside of suitable habitat shall have a 0.6 mile NSO for all non-functional surface disturbance as defined in the Colorado State Plan. Exceptions for allowing functional disturbance within the 0.6 mile NSO may be allowed for exceptional or unique topography or other non-contributing habitat aspects or circumstances that will not adversely impact sage-grouse. If the resources cannot be accessed without disturbing the active Lek NSO habitat, then Best Management Practices will be followed and necessary mitigation utilized to ensure a no net loss to sage grouse potential habitat and no deleterious demographic effect on the population.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		

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22.	2-133 to 2-136		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Fluid Minerals in NTT No. 55 through 61: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH),</u> <u>Close suitable habitat as determined by the County's GIS mapping to future mineral leasing surface disturbance unless the resource cannot be extracted without minimal surface disturbance. In this case, the Best Management Practices will be followed and if necessary mitigation utilized to ensure a no net loss to sage grouse habitat and no deleterious demographic effect on the population.</u></p> <p><u>All active Leks identified outside of suitable habitat shall have a 0.6 mile NSO for all non-functional surface disturbance as defined in the Colorado State Plan. Exceptions for allowing functional disturbance within the 0.6 mile NSO may be allowed for exceptional or unique topography or other non-contributing habitat aspects or circumstances that will not adversely impact sage-grouse. If the resources cannot be accessed without disturbing the active Lek NSO habitat, then Best Management Practices will be followed and necessary mitigation utilized to ensure a no net loss to sage grouse potential habitat and no deleterious demographic effect on the population.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		

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23.	2-129 to 2-133		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Leased Fluid Minerals in NTT No. 47 through 54: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Close suitable habitat as determined by the County's GIS mapping to future mineral leasing surface disturbance unless the resource cannot be extracted without minimal surface disturbance. In this case, the Best Management Practices will be followed and if necessary mitigation utilized to ensure a no net loss to sage grouse habitat and no deleterious demographic effect on the population.</u></p> <p><u>All active Leks identified outside of suitable habitat shall have a 0.6 mile NSO for all non-functional surface disturbance as defined in the Colorado State Plan. Exceptions for allowing functional disturbance within the 0.6 mile NSO may be allowed for exceptional or unique topography or other non-contributing habitat aspects or circumstances that will not adversely impact sage-grouse. If the resources cannot be accessed without disturbing the active Lek NSO habitat, then Best Management Practices will be followed and necessary mitigation utilized to ensure a no net loss to sage grouse potential habitat and no deleterious demographic effect on the population.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		

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24.	2-129 to 2-133		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Leased Fluid Minerals in NTT No. 47 through 54: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Encourage use of anti-perch devices, burying of powerlines, closed rubbish bins, removal of road kill and dead livestock, and other methods to discourage predators on sage-grouse and limit excess predation. If predation on sage-grouse is documented to have a deleterious effect on the Roan Plateau sage-grouse population, then allow for appropriate mitigation of predation under USDA guidance.</u></p> <p><u>Restrict the construction of tall facilities and fences to the minimum number and amount needed. To discourage avian predators, require installation of anti-perch devices on new fences and facilities within 4 miles of occupied suitable habitat where avian predation has been identified as a cause of mortality. Additionally, encourage retrofitting of existing fences and structures with anti-perch devices that are also located within 4 miles of occupied suitable habitat where avian predation has been identified as a cause of mortality.</u></p>		

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25.	2-127 to 2-129		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Unleased Fluid Minerals in NTT No. 46: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Close suitable habitat as determined by the County's GIS mapping to future mineral leasing surface disturbance unless the resource cannot be extracted without minimal surface disturbance. In this case, the Best Management Practices will be followed and if necessary mitigation utilized to ensure a no net loss to sage grouse habitat and no deleterious demographic effect on the population.</u></p> <p><u>All active Leks identified outside of suitable habitat shall have a 0.6 mile NSO for all non-functional surface disturbance as defined in the Colorado State Plan. Exceptions for allowing functional disturbance within the 0.6 mile NSO may be allowed for exceptional or unique topography or other non-contributing habitat aspects or circumstances that will not adversely impact sage-grouse. If the resources cannot be accessed without disturbing the active Lek NSO habitat, then Best Management Practices will be followed and necessary mitigation utilized to ensure a no net loss to sage grouse potential habitat and no deleterious demographic effect on the population.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		

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26.	2-125 through 2-127		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Wild Horses in NTT No. 40 through 45: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Wild Horses and Burro's are not known to occur within the Plan Area and therefore do not presently impact sage grouse habitat.</u></p> <p><u>Collaborate with appropriate agencies to discourage establishment of (feral) wild horse populations that could be detrimental to sage-grouse habitat.</u></p>		

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Comments on Preliminary Draft RMPA/EIS for Local/State Office Review (March 20, 2013)

Cmt #	Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M¹	Response / How Resolved <i>(Reviewers: Leave this column blank)</i>
27.	2-124 to 2-125		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Retirement of Grazing Privileges in NTT No. 39: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Garfield County continues to enjoy a long history of livestock grazing on both private and public lands. When properly managed, livestock can coexist with sage-grouse as well as help improve suitable habitat and decrease fire hazards.</u></p> <p><u>Maintain sustainable grazing consistent with historic land use and ranching practices that are sustainable for both agricultural operations as well as sage-grouse habitats, as recommended by the U.S. Department of Agriculture, Natural Resources Conservation Service throughout the Plan Area.</u></p> <p><u>Livestock grazing can be utilized as a tool to properly manage sage-grouse habitat, and should not be removed from the Plan Area.</u></p> <p><u>Any grazing restrictions or conservation measures that are put in place through a grazing permit shall be based solely on the conditions and activities specific to that permitted grazing allotment.</u></p>		

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28.	2-122 through 2-124		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Structural Range Improvements and Livestock Management Tools in NTT No. 34 through 38: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Maintain sustainable grazing consistent with historic land use and ranching practices that are sustainable for both agricultural operations as well as sage-grouse habitats, as recommended by the U.S. Department of Agriculture, Natural Resources Conservation Service throughout the Plan Area.</u></p> <p><u>Livestock grazing can be utilized as a tool to properly manage sage-grouse habitat, and should not be removed from the Plan Area.</u></p> <p><u>Any grazing restrictions or conservation measures that are put in place through a grazing permit shall be based solely on the conditions and activities specific to that permitted grazing allotment.</u></p> <p><u>All federal and state agencies with management responsibilities in the plan area for the species and/or its habitat shall provide the County with an annual update of the monitoring programs they have in place, data collected and specifics about their collection protocols. These agencies will inform the County of proposed research projects and allow for the County's input and collaboration prior to implementation.</u></p>		

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29.	2-122 through 2-124		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Structural Range Improvements and Livestock Management Tools in NTT No. 34 through 38: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), All data shall be collected according to the guidelines issued under the Information Quality Act.</u></p> <p><u>All data that is gathered in the Plan Area shall be shared with the County in a timely manner, and supplied to the County regardless of its state of completion at the formal request of the County.</u></p> <p><u>Private landowners are also encouraged to monitor and share data collected on private property with the County.</u></p> <p><u>All data that is shared with the County that is not public information will be treated as confidential and used by the County only to help inform its policies and best management practices.</u></p>		

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30.	2-120 through 2-122		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Treatments to Increase Forage for Livestock / wild Ungulates in NTT No. 32 through 33: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Maintain sustainable grazing consistent with historic land use and ranching practices that are sustainable for both agricultural operations as well as sage-grouse habitats, as recommended by the U.S. Department of Agriculture, Natural Resources Conservation Service throughout the Plan Area.</u></p> <p><u>Livestock grazing can be utilized as a tool to properly manage sage-grouse habitat, and should not be removed from the Plan Area.</u></p> <p><u>Any grazing restrictions or conservation measures that are put in place through a grazing permit shall be based solely on the conditions and activities specific to that permitted grazing allotment.</u></p> <p><u>All federal and state agencies with management responsibilities in the plan area for the species and/or its habitat shall provide the County with an annual update of the monitoring programs they have in place, data collected and specifics about their collection protocols. These agencies will inform the County of proposed research projects and allow for the County's input and collaboration prior to implementation.</u></p>		

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31.	2-120 through 2-122		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Treatments to Increase Forage for Livestock / wild Ungulates in NTT No. 32 through 33: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), All data shall be collected according to the guidelines issued under the Information Quality Act.</u></p> <p><u>All data that is gathered in the Plan Area shall be shared with the County in a timely manner, and supplied to the County regardless of its state of completion at the formal request of the County.</u></p> <p><u>Private landowners are also encouraged to monitor and share data collected on private property with the County.</u></p> <p><u>All data that is shared with the County that is not public information will be treated as confidential and used by the County only to help inform its policies and best management practices.</u></p>		

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32.	2-117 through 2-120		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Riparian Areas and Wet Meadows in NTT No. 27 through 31: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Maintain sustainable grazing consistent with historic land use and ranching practices that are sustainable for both agricultural operations as well as sage-grouse habitats, as recommended by the U.S. Department of Agriculture, Natural Resources Conservation Service throughout the Plan Area.</u></p> <p><u>Livestock grazing can be utilized as a tool to properly manage sage-grouse habitat, and should not be removed from the Plan Area.</u></p> <p><u>Any grazing restrictions or conservation measures that are put in place through a grazing permit shall be based solely on the conditions and activities specific to that permitted grazing allotment.</u></p> <p><u>All federal and state agencies with management responsibilities in the plan area for the species and/or its habitat shall provide the County with an annual update of the monitoring programs they have in place, data collected and specifics about their collection protocols. These agencies will inform the County of proposed research projects and allow for the County's input and collaboration prior to implementation.</u></p>		

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33.	2-117 through 2-120		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Riparian Areas and Wet Meadows in NTT No. 27 through 31: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), For areas within the political boundaries of Garfield County within Suitable Habitat (SH), All data shall be collected according to the guidelines issued under the Information Quality Act.</u></p> <p><u>All data that is gathered in the Plan Area shall be shared with the County in a timely manner, and supplied to the County regardless of its state of completion at the formal request of the County.</u></p> <p><u>Private landowners are also encouraged to monitor and share data collected on private property with the County.</u></p> <p><u>All data that is shared with the County that is not public information will be treated as confidential and used by the County only to help inform its policies and best management practices.</u></p>		

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34.	2-115 through 2-117		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Implementing Management Actions after Land Health and Habitat Evaluations in NTT No. 23 through 26: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), All federal and state agencies with management responsibilities in the plan area for the species and/or its habitat shall provide the County with an annual update of the monitoring programs they have in place, data collected and specifics about their collection protocols. These agencies will inform the County of proposed research projects and allow for the County's input and collaboration prior to implementation.</u></p> <p><u>All data shall be collected according to the guidelines issued under the Information Quality Act.</u></p> <p><u>All data that is gathered in the Plan Area shall be shared with the County in a timely manner, and supplied to the County regardless of its state of completion at the formal request of the County.</u></p> <p><u>Private landowners are also encouraged to monitor and share data collected on private property with the County.</u></p> <p><u>All data that is shared with the County that is not public information will be treated as confidential and used by the County only to help inform its policies and best management practices.</u></p>		

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35.	2-115 through 2-117		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Implementing Management Actions after Land Health and Habitat Evaluations in NTT No. 23 through 26: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Garfield County continues to enjoy a long history of livestock grazing on both private and public lands. When properly managed, livestock can coexist with sage-grouse as well as help improve suitable habitat and decrease fire hazards.</u></p> <p><u>Maintain sustainable grazing consistent with historic land use and ranching practices that are sustainable for both agricultural operations as well as sage-grouse habitats, as recommended by the U.S. Department of Agriculture, Natural Resources Conservation Service throughout the Plan Area.</u></p> <p><u>Livestock grazing can be utilized as a tool to properly manage sage-grouse habitat, and should not be removed from the Plan Area.</u></p> <p><u>Any grazing restrictions or conservation measures that are put in place through a grazing permit shall be based solely on the conditions and activities specific to that permitted grazing allotment.</u></p>		

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36.	2-115 to 2-115		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Range Management in NTT No. 19 through 22: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Maintain sustainable grazing consistent with historic land use and ranching practices that are sustainable for both agricultural operations as well as sage-grouse habitats, as recommended by the U.S. Department of Agriculture, Natural Resources Conservation Service throughout the Plan Area.</u></p> <p><u>Livestock grazing can be utilized as a tool to properly manage sage-grouse habitat, and should not be removed from the Plan Area.</u></p> <p><u>Any grazing restrictions or conservation measures that are put in place through a grazing permit shall be based solely on the conditions and activities specific to that permitted grazing allotment.</u></p> <p><u>Predation of sage-grouse eggs, juveniles, and adults occurs naturally, but can increase in association with human development, unless precautions are undertaken.</u></p> <p><u>Encourage use of anti-perch devices, burying of power lines, closed rubbish bins, removal of road kill and dead livestock, and other methods to discourage predators on sage-grouse and limit excess predation. If predation on sage-grouse is documented to have a deleterious effect on the Roan Plateau sage-grouse population, then allow for appropriate mitigation of predation under USDA guidance.</u></p>		

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37.	2-115 to 2-115		Fred Jarman	Garfield County	Add the following text under Alternative D for Range Management in NTT No. 19 through 22: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Restrict the construction of tall facilities and fences to the minimum number and amount needed. To discourage avian predators, require installation of anti-perch devices on new fences and facilities within 4 miles of occupied suitable habitat where avian predation has been identified as a cause of mortality. Additionally, encourage retrofitting of existing fences and structures with anti-perch devices that are also located within 4 miles of occupied suitable habitat where avian predation has been identified as a cause of mortality.</u>		
38.	2-113		Fred Jarman	Garfield County	Add the following text under Alternative D for Proposed Land Withdrawals in NTT No. 17 through 18a: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u>		

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39.	2-112		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Land Tenure Adjustment in NTT No. 15 through 16: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Private land ownership of sage-grouse Habitat areas should be continued and encouraged as private land conservation efforts have been the most effective methods to preserve diverse and healthy habitats for many species.</u></p> <p><u>No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.</u></p>		
40.	2-111		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Lands Realty (ROW) in NTT No. 14: <u>For areas within the political boundaries of Garfield County within Suitable Habitat (SH), Placement of new above-ground power lines in Suitable Habitat and Lek NSO areas is prohibited.</u></p> <p><u>Bury new powerlines within Suitable Habitats and follow existing corridors unless there is a technical infeasibility, subject to valid existing rights. Anti-perch devices may be used where powerline burial is technically infeasible.</u></p> <p><u>Encourage placement liquid gathering facilities outside of priority areas. Have no tanks at well locations within priority areas (minimizes perching and nesting opportunities for ravens and raptors and truck traffic). Pipelines must be under or immediately adjacent to the road (Bui et al. 2010).</u></p>		

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41.	2-111		Fred Jarman	Garfield County	Add the following text under Alternative D for Lands Realty (ROW) in NTT No. 13: <u>For areas within the political boundaries of Garfield County, "avoidance areas" are only to be considered for lands within Suitable Habitat (SH) and 0.6 miles NSO areas from an active lek that occurs outside of suitable habitat as defined by Garfield County.</u>		
42.	2-111		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Lands Realty (ROW) in NTT No. 12: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), Habitats within the Plan Area are naturally fragmented and patchy; therefore, there are opportunities for new roads and energy development infrastructure to be placed outside Suitable Habitats. Further, any land acquisition shall be by mutual agreement between public and private entities.</u></p> <p><u>Placement of new above-ground power lines in Suitable Habitat and Lek NSO areas is prohibited.</u></p> <p><u>Bury new powerlines within Suitable Habitats and follow existing corridors unless there is a technical infeasibility, subject to valid existing rights. Anti-perch devices may be used where powerline burial is technically infeasible.</u></p> <p><u>Encourage placement liquid gathering facilities outside of priority areas. Have no tanks at well locations within priority areas (minimizes perching and nesting opportunities for ravens and raptors and truck traffic). Pipelines must be under or immediately adjacent to the road (Bui et al. 2010).</u></p>		

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43.	2-111		Fred Jarman	Garfield County	Add the following text under Alternative D for Lands Realty (ROW) in NTT No. 11: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), Bury new powerlines within Suitable Habitats and follow existing corridors unless there is a technical infeasibility, subject to valid existing rights. Anti-perch devices may be used where powerline burial is technically infeasible.</u>		
44.	2-110		Fred Jarman	Garfield County	Under Disturbance Exception Criteria where it states the “authorized officer may authorize disturbance” needs to include objective and publically available criteria to make that decision rather than leaving it to personal discretion.		
45.	2-110		Fred Jarman	Garfield County	Add the following text under Alternative D for Lands Realty (ROW) in NTT No. 10: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH),: Encourage clustering / centralization of disturbances, operations (fracture stimulation, liquids gathering, etc.), and facilities.</u> <u>Encourage placement of infrastructure in already disturbed locations where the habitat has not been restored.</u> <u>Encourage a phased development approach with concurrent reclamation.</u> <u>Encourage placement liquid gathering facilities outside of priority areas. Have no tanks at well locations within priority areas (minimizes perching and nesting opportunities for ravens and raptors and truck traffic). Pipelines must be under or immediately adjacent to the road (Bui et al. 2010).</u>		

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46.	2-110		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Lands Realty (ROW) in NTT No. 10: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), this habitat is naturally fragmented and patchy; therefore, there are opportunities for new roads and energy development infrastructure to be placed outside Suitable Habitats. Further, any land acquisition shall be by mutual agreement between public and private entities.</u></p> <p><u>Placement of new above-ground power lines in Suitable Habitat and Lek NSO areas is prohibited.</u></p> <p><u>Bury new powerlines within Suitable Habitats and follow existing corridors unless there is a technical infeasibility, subject to valid existing rights. Anti-perch devices may be used where powerline burial is technically infeasible.</u></p> <p><u>Encourage clustering / centralization of disturbances, operations (fracture stimulation, liquids gathering, etc.), and facilities.</u></p>		

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47.	2-109		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Recreation in NTT No. 9: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), Recreational use within Suitable Habitat is extremely limited because the majority of the land is privately held and access is strictly controlled. This significantly reduces potential direct or indirect impacts to sage-grouse or their habitats by the general public. Any plan for creating new or additional recreational opportunities on federal lands in Suitable Habitats must provide Garfield County a sage-grouse impact analysis for review.</u></p> <p><u>Limit motorized recreational use to existing roads, primitive roads, and trails (as verified by Garfield County), in Suitable Habitat and Lek NSO areas.</u></p> <p><u>Avoid all Suitable Habitat and Lek NSO areas as identified on Garfield County Habitat Maps.</u></p>		

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48.	2-108		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Recreation in NTT No. 9: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), Encourage habitat restoration projects on private land. Request that private landowners report annually on the progress of restoration efforts (providing spatial data associated with an API number, date, and status of restoration), so the County may track disturbed vs. restored acreages in and near Suitable Habitat.</u></p> <p><u>Recognizing that local conditions in the Plan Area differ from those range-wide for sage-grouse, the County's mapped Suitable Habitat will be used for quantifying habitat conservation objectives of no net loss of Suitable Habitat (excluding that resulting from wildfire and temporary disturbances, as permitted).</u></p> <p><u>Require the use of native plant species for restoration based on availability, and probability of successful establishment.</u></p>		

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49.	2-108		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Travel in NTT No. 7 and 8: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), Allow no upgrading of existing routes, as verified by Garfield County, in Suitable Habitat or Lek NSO areas that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road.</u></p> <p><u>When reclaiming roads and trails, use locally native seed mixes as prescribed by a professional biologist and use transplanted or seeded sagebrush unless unfeasible.</u></p>		
50.	2-108		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Travel in NTT No. 6: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), Allow no upgrading of existing routes, as verified by Garfield County, in Suitable Habitat or Lek NSO areas that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road.</u></p>		

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51.	2-106		Fred Jarman	Garfield County	Add the following text under Alternative D for Travel in NTT No. 4: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), Allow no upgrading of existing routes, as verified by Garfield County, in Suitable Habitat or Lek NSO areas that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road.</u>		
52.	2-106		Fred Jarman	Garfield County	Add the following text under Alternative D for Travel in NTT No. 2: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), County roads, as determined by Garfield County and identified on County Maps (see Habitat Maps Chapter of the Plan), shall only be closed or restricted by Garfield County.</u>		

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53.	2-106		Fred Jarman	Garfield County	<p>Add the following text under Alternative D for Travel in NTT No. 1: <u>For areas within the political boundaries of Garfield County in Suitable habitat (SH), Limit motorized travel to existing roads, primitive roads, and trails, as verified by Garfield County, at a minimum in Suitable Habitats and in Lek NSO areas.</u></p> <p><u>County roads, as determined by Garfield County and identified on County Maps (see Habitat Maps Chapter of the Plan), shall only be closed or restricted by Garfield County.</u></p> <p><u>Allow no upgrading of existing routes, as verified by Garfield County, in Suitable Habitat or Lek NSO areas that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road.</u></p> <p><u>When reclaiming roads and trails, use locally native seed mixes as prescribed by a professional biologist and use transplanted or seeded sagebrush unless unfeasible.</u></p>		
54.	2-110		Fred Jarman	Garfield County	In Alternative D under Disturbance Exception Criteria where it states “authorized officer may authorize disturbance in” it should say “...authorized officer may authorize disturbance <u>using publicly available objective criteria...</u> ”		

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55.	ES-5	7-9	Fred Jarman	Garfield County	Correct acreage totals for BLM-administered lands in the planning area. Current acreage totals include private lands not administered by the BLM. (Page 1-2 uses approximately 1,669,669 acres of BLM and NFS administered lands, and 2,711,233 acres of federal mineral estate that may lie beneath other surface ownerships, but do not take into account the differences between suitable habitat as mapped by Garfield County and the BLM/CPW PPH and PGH map totals.) This statement conflicts with, and is inconsistent with Garfield County Plan Principle #6 (GCGSGCP pg 30). "No policies shall infringe on the private property rights of any landowner within Garfield County. All species and land coverage information gathered on private property shall be treated as the property of the landowner and shall not be used by any private or government entity for any purpose unless express, written permission has been obtained by the landowner." Action necessary for consistency: remove private land acreages from PPH, PGH and linkage habitat acreage totals as BLM-administered lands.		

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56.	ES-8	19-22	Fred Jarman	Garfield County	Garfield County Sage-Grouse Suitable Habitat Map was developed using the habitat criteria consistent with Connelly et al. 2004. Based on the uniqueness of the habitats on the Roan, these criteria were “relaxed” in order to pick up potential habitats in less optimal habitats (such as mixed mountain shrublands, and on steeper slopes, and closer to forests), therefore allowing for more habitat than otherwise would be captured under the WAFWA standards. Action needed: Use Garfield County’s approved sage-grouse suitable habitat maps for those areas within the planning area that are within the political boundaries of Garfield County.		
57.	ES-9	8	Fred Jarman	Garfield County	In part agrees with Garfield County Plan to recognize private property rights and in part conflicts with Garfield County Plan which insists that no policies shall “infringe” on private property rights. See Principle #6. “No policies shall infringe on private property rights of any landowner within Garfield County. All species and land coverage information gathered on private property shall be treated as the property of the landowner and shall not be used by any private or government entity for any purposes unless express, written permission has been obtained by the landowners.”		
58.	ES-9	13-16	Fred Jarman	Garfield County	Agrees with Garfield County’s Sage-Grouse Plan Implementation process through government-to-government coordination.		
59.	ES-9	17-19	Fred Jarman	Garfield County	Consistent with Garfield County’s Sage-Grouse Plan.		

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60.	ES-9	26-29	Fred Jarman	Garfield County	Agrees in part with Garfield County’s Plan, however Garfield County’s plan goes further requiring that “All data and information used to produce conservation measures shall be made available to the public and the County and shall be coordinated with the County.” (See principle #10).		
61.	ES-10	4-8	Fred Jarman	Garfield County	Agrees with Garfield County’s Plan		
62.	ES-10	13	Fred Jarman	Garfield County	Agrees in part with Garfield County Plan Principle #10, however, the Garfield County principle goes further to ensure that there is a cause and effect relationship between the conservation measure and the benefit to the species.		
63.	ES-10	22-25	Fred Jarman	Garfield County	Current mapping data relied upon to determine PPH, PGH and linkage areas is not reproducible and does not comply with the Information Quality Act of 2000. The data upon which it relies has not been released to the public, and has been prepared using “guesswork” and “assumptions” rather than best available science. (See April 4, 2013 Comments by Brad Petch during Garfield County, BLM, USFWS and CPW coordination meeting). Need to replace mapping for the area within the political boundaries of Garfield County with Garfield County approved sage-grouse suitable habitat maps. Failure to utilize maps that comply with IQA violates not only the BLM’s criteria, but also Garfield County Principle #3: “Sage-grouse management decisions shall be made based on the best available scientific information that is applicable to sage-grouse habitat in Garfield County. The scientific information used will be consistent with standards of the Information Quality Act (see definitions of Quality, Objectivity, Utility and Integrity), as determined by the County.		

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64.	ES-10	26-33	Fred Jarman	Garfield County	Conflicts with Garfield County Principle #1 which recognizes the uniqueness of the habitat in the county compared with other areas of the state and region and requires that development of the conservation measures be done from a bottom up approach using local knowledge and expertise, rather than a national and state top down approach.		
65.	ES-12	3-7	Fred Jarman	Garfield County	This statement conflicts with the purpose of the Garfield County Plan which does not limit the development of conservation measures or the analysis of impacts to just those identified by the USFWS's candidate determination notice of 2010.		
66.	ES-12	27-28	Fred Jarman	Garfield County	Insert <u>Suitable Habitat</u> to the following title: "Delineated Lands as Preliminary Priority Habitat, Preliminary General Habitat, and Linkages and <u>Suitable Habitat</u> as contained within the political boundaries of Garfield County determined by the <u>Garfield County Habitat Map.</u> "		
67.	ES-12	29-32	Fred Jarman	Garfield County	Add the following text after alternative, line 30: <u>except for the areas within the political boundaries of Garfield County under Alternative D, where the habitat is delineated as Suitable habitat (SH) determined by the Garfield County Habitat Map.</u>		
68.	1-2	Table 1-1	Fred Jarman	Garfield County	Planning Area Land Ownership and GRSG Habitat Table. Change the Garfield County row data to: GRSG Habitat Type to <u>SH (Suitable Habitat)</u> , BLM Land Ownership <u>7,491</u> ; State, County, City <u>31.5</u> ; Private <u>21,313.5</u> ; and Unclassified <u>11.8</u> . (Based on Garfield County updated plan maps)		

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69.	1-3	Table 1-2	Fred Jarman	Garfield County	Subsurface Federal Mineral Estate Table. Change Garfield County row data to: GRSG Habitat Type <u>SH (Suitable Habitat)</u> . All minerals <u>28,847.8</u> ; Planning Area Subtotal SH <u>28,847.8</u> ; Planning Area Total Acres <u>28,847.8</u> . (Note that 14,791.6 are under private lands).		
70.	1-8	4-11	Fred Jarman	Garfield County	Inconsistent with Garfield County Plan description of Roan Plateau. Replace text with: <u>The Parachute-Piceance-Roan Plateau area is comprised of roughly 28,847.8 acres of suitable habitat (SH). Roughly 85% of the land within the area does not support habitat characteristics necessary to support GSG as identified by Connelly et. al. 2004. The area is naturally fragmented, as a result of topography and the patch nature of sagebrush, non-sagebrush shrubs, meadows, aspen and conifers in the Plan area. Expanses of contiguous sagebrush, necessary to support a large stable population do not exist. Additionally, the sage-grouse population inhabiting the area is a peripheral population located on the far southeastern edge of the species range.</u>		
71.	1-17	14-17	Fred Jarman	Garfield County	Garfield County Sage-Grouse Suitable Habitat Map was developed using the habitat criteria consistent with Connelly et al. 2004. Based on the uniqueness of the habitats on the Roan, these criteria were “relaxed” in order to pick up potential habitats in less optimal habitats (such as mixed mountain shrublands, and on steeper slopes, and closer to forests), therefore allowing for more habitat than otherwise would be captured under the WAFWA standards. Action needed: Use Garfield County’s approved sage-grouse suitable habitat maps for those areas within the planning area that are within the political boundaries of Garfield County.		

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72.							
73.	1-17	18-20	Fred Jarman	Garfield County	BLM Instruction Memorandum 2012-044 requires that at the sub-regional level adjustments be made to conservation measures in order to address “local ecological site variability.” Because of the very specific and unique ecological site variability in Garfield County habitat, inserting the County’s Plan as the preferred alternative for the area within the political boundaries of Garfield County would be an appropriate and consistent action to comply with IM 2012-044.		
74.	1-17	39	Fred Jarman	Garfield County	In part agrees with Garfield County Plan to recognize private property rights and in part conflicts with Garfield County Plan which insists that no policies shall “infringe” on private property rights. See Principle #6. “No policies shall infringe on private property rights of any landowner within Garfield County. All species and land coverage information gathered on private property shall be treated as the property of the landowner and shall not be used by any private or government entity for any purposes unless express, written permission has been obtained by the landowners.”		
75.	1-18	1-5	Fred Jarman	Garfield County	Agrees with Garfield County’s Sage-Grouse Plan principle 4 and 5 requiring the Counties policies be applied on public lands as regulatory assurances through Coordination and applied on private lands as incentive-based assurances.		
76.	1-18	6-9	Fred Jarman	Garfield County	Agrees with Garfield County’s Sage-Grouse Plan Implementation process through government-to-government coordination.		
77.	1-18	10-13	Fred Jarman	Garfield County	Consistent with Garfield County’s Sage-Grouse Plan.		

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78.	1-18	14-17	Fred Jarman	Garfield County	Garfield County's Sage-Grouse Plan should be rigorously analyzed as an alternative for the habitat area within the political boundaries of County.		
79.	1-18	22-26	Fred Jarman	Garfield County	Agrees in part with Garfield County's Plan, however Garfield County's plan goes further requiring that "All data and information used to produce conservation measures shall be made available to the public and the County and shall be coordinated with the County." (See principle #10). Also, Garfield County's Plan includes, at a minimum, annual updates and changes to the conservation measures to ensure new science and effectiveness of conservation measures are based on the most current and best science as is appropriate to the unique Garfield County habitat (See principle #1).		
80.	1-18, 19	41-42, 1-4	Fred Jarman	Garfield County	Consistent with Garfield County Plan.		
81.	1-19	9-10	Fred Jarman	Garfield County	Agrees in part with Garfield County Plan Principle #10, however, the Garfield County principle goes further to ensure that there is a cause and effect relationship between the conservation measure and the benefit to the species.		

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82.	1-19	22-26	Fred Jarman	Garfield County	Current mapping data relied upon to determine PPH, PGH and linkage areas is not reproducible and does not comply with the Information Quality Act of 2000. The data upon which it relies has not been released to the public, and has been prepared using “guesswork” and “assumptions” rather than best available science. (See April 4, 2013 Comments by Brad Petch during Garfield County, BLM, USFWS and CPW coordination meeting). Need to replace mapping for the area within the political boundaries of Garfield County with Garfield County approved sage-grouse suitable habitat maps. Failure to utilize maps that comply with IQA violates not only the BLM’s criteria, but also Garfield County Principle #3: “Sage-grouse management decisions shall be made based on the best available scientific information that is applicable to sage-grouse habitat in Garfield County. The scientific information used will be consistent with standards of the Information Quality Act (see definitions of Quality, Objectivity, Utility and Integrity), as determined by the County.		
83.	2-2	31-38	Fred Jarman	Garfield County	Garfield County Plan as an alternative for the area within the political boundaries of the county meets all five of the alternative goals identified: (1) Addresses the identified major planning issues, (2) explores opportunities to enhance management of resources and resource uses, (however, Garfield County plan goes further here by providing for immediate updates and changes to the conservation measures instead of at the end of a five year review period), (3) resolve conflicts among resources and resource uses, (4) meets the purpose of and need for the RMP and RMPA, and (5) is feasible.		

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84.	2-3	1-6	Fred Jarman	Garfield County	If Garfield County Plan is not included as an alternative within the political boundaries of Garfield County, then major conflicts between the four alternatives and Garfield County's plan will need to be resolved prior to release of the Draft EIS.		
85.	2-4	1-14	Fred Jarman	Garfield County	Substantial conflicts exist between Alternative A and the Garfield County Plan that must be resolved and discussed in the draft EIS if the Garfield Plan is not included as an alternative for the area within the political boundaries of Garfield County. Appropriate methods, procedures, actions and/or programs for consistency review will need to be carried out prior to release of the draft EIS. (43 CFR 1610.3.1(3))		
86.	2-4, 5	15-26, 1-2	Fred Jarman	Garfield County	Substantial conflicts exist between Alternative B and the Garfield County Plan that must be resolved and discussed in the draft EIS if the Garfield Plan is not included as an alternative for the area within the political boundaries of Garfield County. Appropriate methods, procedures, actions and/or programs for consistency review will need to be carried out prior to release of the draft EIS. (43 CFR 1610.3.1(3))		
87.	2-5	3-12	Fred Jarman	Garfield County	Substantial conflicts exist between Alternative C and the Garfield County Plan that must be resolved and discussed in the draft EIS if the Garfield Plan is not included as an alternative for the area within the political boundaries of Garfield County. Appropriate methods, procedures, actions and/or programs for consistency review will need to be carried out prior to release of the draft EIS. (43 CFR 1610.3.1(3))		

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88.	2-5	13-26	Fred Jarman	Garfield County	Substantial conflicts exist between Alternative D and the Garfield County Plan that must be resolved and discussed in the draft EIS if the Garfield Plan is not included as an alternative for the area within the political boundaries of Garfield County. Appropriate methods, procedures, actions and/or programs for consistency review will need to be carried out prior to release of the draft EIS. (43 CFR 1610.3.1(3))		
89.	2-2 (2 nd 2-2)	9	Fred Jarman	Garfield County	Insert after “state agencies,” <u>local governments</u> .		
90.	2-3 (2 nd 2-3)	35-38	Fred Jarman	Garfield County	Statement that “Restrictions on resource uses (e.g. closed to leasing) made through this amendment apply for the life of the RMP,” conflicts with Garfield County Plan where the cause and effect of impacts on sage-grouse and its habitat are reviewed and adjusted at a minimum annually. The county’s plan is deliberately designed to react to changes quickly, utilizing the county’s plan amendment process which can be finalized and implemented within months of determining the measures need to be changed.		
91.	2-2 (3 rd 2-2)	Table 2-2	Fred Jarman	Garfield County	Comparative Summary of Alternatives: To include Garfield County Plan under Alternative D, adjust habitat acres to reflect 0 acres of PPH, PGH and Linkage for the area within the political boundaries of Garfield County, and add “ <u>Suitable Habitat</u> ” category that adds <u>28,847.8</u> acres. All other acreage numbers in table need to be changed to reflect the inclusion of the Garfield County Plan alternative.		

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92.	2-2 (3 rd 2-2)	Table 2-2	Fred Jarman	Garfield County	Identified for withdrawal: Change Alternative D to reflect the Suitable Habitat within the boundaries of Garfield County would not be subject to withdrawal. (See Mineral Development Policy C: “No federal land mineral withdrawals shall be made in Suitable Habitat areas if the resources can be accessed and extracted without surface disturbance.”)		
93.	2-12	NTT no. 5	Fred Jarman	Garfield County	Alternative B, Travel Management: 3% disturbance policy conflicts with Garfield County Principle #9: “The ability of wildlife, including sage-grouse to habituate to inanimate manmade structures and changes to the landscape shall be acknowledged. Conflicts with Principle # 8, requiring that the land should not be managed for a singular purpose, which a 3% disturbance cap effectively forces to occur. It also conflicts with principle #3 requiring all decision be made based on the “best available scientific information that is applicable to sage-grouse habitat in Garfield County.” A 3% disturbance cap across the PPH, PGH and linkage areas as mapped by BLM and CPW is not supported by best available science as most of this area is not capable of providing adequate habitat for the sage-grouse.		
94.	2-17	NTT No. 9	Fred Jarman	Garfield County	Alternative B, Recreation: To be consistent with Garfield County Plan, insert the following: <u>Any plan for creating new or additional recreational opportunities on federal lands in Suitable Habitat areas within the political boundaries of Garfield County must provide to the County a sage-grouse impact analysis for review.</u> (See GCSGCP page 33, Recreation.)		

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95.	4-7	20-23	Fred Jarman	Garfield County	Assumption re Disturbances: Conflicts with Garfield County Plan Principle #9 which recognizes that “The ability of wildlife, including sage-grouse, to habituate to inanimate manmade structures and changes to the landscape shall be acknowledged.” Change the word “would” to “may” in line 20.		
96.	4-7	29-31	Fred Jarman	Garfield County	Assumption re Information Basis for Decisions: Conflicts with Garfield County Plan Principle # 3 and #10 which requires all conservation measures, policies and management actions taken to conserve the Sage-Grouse be based on “best available science,” verified under the criteria set forth in the Information Quality Act, and must be applicable to the local habitat. These measures shall be scientifically defensible and take into account the latest research and technological advances. Also the balance of impacts to other species must also be weighed. To correct the inconsistency, replace “information” with <u>science</u> at line 29 and add <u>consistent with the standards of the Information Quality Act.</u> Strike “management and conservation plans, and other research and related directives” and replace with <u>Those management and conservation plans and other research and related directives that have been developed using the best available science and most recent technological advances as well as being locally applicable, will be relied upon</u> and finish sentence with existing “to guide wildlife habitat management on BLM-administered lands.”		

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97.	4-1 through 4-567	All	Fred Jarman	Garfield County	Comment Pertaining to Chapter 4, Environmental Consequences: CEQ regulations at 40 CFR 1502.16(c) requires the following to be included in this analysis; “Possible conflicts between the proposed action and the objective of Federal, regional, State, and local land use plans, policies and controls for the area concerned.” It also requires that “Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.” (40 CFR 1506.2(d)) BLM Land Use Planning Regulations also require consistency with Garfield County. (43 CFR 1610.3-1 and 2) If the Garfield County Plan is not included as an alternative for the area within the political boundaries of the county, then each of the impact discussions in this chapter must evaluate the conflicts between the proposed action and Garfield County’s Plan. A few examples of how these could be identified and resolved are shown in the following four comments for pages 4-9 through 4-11.		

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98.	4-9	1-5	Fred Jarman	Garfield County	Impacts from Travel Management on Terrestrial Wildlife, Habitat Degradation: Alternative A - D fails to recognize Garfield County Travel Management Policy B, which states "County roads, as determined by Garfield County and indentified on County Maps, shall only be closed or restricted by Garfield County." (D conflicts only if Garfield County Plan is not included as a part of this alternative) Suggested resolution: Add to Alternative's B, C, and D <u>For the areas within the political boundaries of Garfield County, County roads shall only be closed or restricted by Garfield County. BLM will coordinate with the County to discuss closures of County's roads it finds would be beneficial to the sage-grouse.</u>		
99.	4-9, 4-10	27-38, 1-2	Fred Jarman	Garfield County	Impacts from Travel Management on Terrestrial Wildlife, Habitat Fragmentation: Alternative B, C and D fails to recognize Garfield County Travel Management Policy B, which states "County roads, as determined by Garfield County and indentified on County Maps, shall only be closed or restricted by Garfield County." (D conflicts only if Garfield County Plan is not included as a part of this alternative) Suggested resolution: Add to Alternative's B, C, and D <u>For the areas within the political boundaries of Garfield County, County roads shall only be closed or restricted by Garfield County. BLM will coordinate with the County to discuss closures of County's roads it finds would be beneficial to the sage-grouse.</u>		

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100.	4-10	3-15	Fred Jarman	Garfield County	Impacts from Travel Management on Terrestrial Wildlife, Habitat Restoration: Alternative B, C and D fails to recognize Garfield County Travel Management Policy B, which states “County roads, as determined by Garfield County and indentified on County Maps, shall only be closed or restricted by Garfield County.” (D conflicts only if Garfield County Plan is not included as a part of this alternative) Suggested resolution: Add to Alternative’s B, C, and D <u>For the areas within the political boundaries of Garfield County, County roads shall only be closed or restricted by Garfield County. BLM will coordinate with the County to discuss closures of County’s roads it finds would be beneficial to the sage-grouse.</u>		
101.	4-10, 4-11	29-36, 1-3	Fred Jarman	Garfield County	Impacts from Recreation Management on Terrestrial Wildlife, Permitted Uses: Alternatives A-D fails to recognize Garfield County Recreation Policy that requires “Any plan for creating new or additional recreational opportunities on federal lands in Suitable Habitats must provide Garfield County a sage-grouse impact analysis for review.” (D conflicts only if Garfield County Plan is not included as a part of this alternative) Suggested resolution: add the following text to each alternative description. <u>An impact analysis will need to be provided to Garfield County prior to approval of any recreational action in areas of Suitable Habitat in Garfield County.</u>		
102.	5-4	Table 5-1	Fred Jarman	Garfield County	Add to Past Present and Reasonably Foreseeable Projects, Plans or Actions that comprise the Cumulative Impacts Scenario: <u>Garfield County Greater Sage-Grouse Conservation Plan (Garfield County 2013) and the Parachute Piceance Roan Conservation Plan.</u>		

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103.	5-11	11	Fred Jarman	Garfield County	Insert <u>local government</u> so that the sentence reads "... coordination with states, <u>local governments</u> and agencies during consistency reviews,"		
104.	G-2	27-39	Fred Jarman	Garfield County	Conflicts with Garfield County Plan. Insert underlined sections into the text at line 33, after "However, <u>a portion</u> of the PPH does have special worth, and does give the BLM cause for concern." <u>This area excludes that within the political boundaries of Garfield County where the habitat is naturally fragmented (patch size averages 16.7 acres) and is attended by a limited peripheral population that is not essential to the species survival.</u>		
105.	G-3	1-11	Fred Jarman	Garfield County	Insert at the end of the sentence on line 8: <u>excluding the area within the political boundaries of Garfield County which contains naturally fragmented habitat and is attended by a limited peripheral population that is not essential to the species survival.</u>		
106.	3-274	8-12	Fred Jarman	Garfield County	Narrative describing study area unemployment rates and their relationship to the State of Colorado rate is inconsistent with the data presented in Table 3-97		
107.	3-276	Table 3-98	Fred Jarman	Garfield County	Footnote 2 references party spending per visit which is not a component of this table.		
108.	3-276	2-3	Fred Jarman	Garfield County	Total estimated visitor spending on BLM and Forest Service lands in the study area of \$301 million may be low. Colorado Division of Parks and Wildlife estimated the annual direct economic impact of hunting and fishing alone in these counties at \$218 million in 2008.		
109.	3-280	11-35	Fred Jarman	Garfield County	Discussion of mining employment should also note that mining activity (particularly oil and gas drilling) also generates a substantial number of jobs that are classified in the construction sector and not included in the numbers in these paragraphs.		

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110.	4-532	Table 4-13	Fred Jarman	Garfield County	Table indicates Alternative A (No Action) grazing on federal lands supports \$1.8 million to \$2.6 million in annual economic output. However, Table K-11 in socioeconomic appendix indicates Alternative A supports 327,000 to 477,000 AUMs, while Table K-12 indicates the total economic impact per AUM is \$106 to \$133. Combining these figures, Alternative A should support between \$35 and \$63 million in annual economic output from grazing.		
111.	4-535	Table 4-14	Fred Jarman	Garfield County	The total output figures from recreation appear consistent with the assumptions set forth in Appendix K. However, the assumption in that appendix of an average visitor expenditure of \$37.20 per day for non-local, overnight trips (page K-32, line 13) is very low and inconsistent with the data reported in Table 3-99, which indicates non-local overnight visitors spend \$91 to \$201 per visitor day depending on their accommodations.		
112.	4-537	27-28	Fred Jarman	Garfield County	Text notes that existing wells would not be impacted by the alternatives. Should also note that new wells from existing leases would also not be impacted. Was this consideration reflected in the economic analysis?		
113.	4-538	14-22	Fred Jarman	Garfield County	BLM has not provided an estimate of the economic impact of Alternative D on oil and gas, yet has identified Alternative D as its Preferred Alternative. BLM should not proceed to issue a ROD in favor of Alternative D without providing some quantification of its economic impact on oil and gas, even if that impact must be shown as “up to” the impacts identified for Alternative B.		
114.	4-544	Table 4-17	Fred Jarman	Garfield County	Far right column is mislabeled. Should be labeled “Impact of Alternative C relative to 2010 Baseline.” Numbers should be shown as negative.		

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115.	4-544	Table 4-17	Fred Jarman	Garfield County	The comparison of the economic contribution under Alternative A and Alternative C, and the impact of Alternative C relative to 2010 conditions, is useful. However, a summary of the estimated economic impact of Alternative D (BLM's Preferred Alternative) would be more useful, given the likelihood that BLM will proceed with that alternative.		
116.	5-51	Table 5-5	Fred Jarman	Garfield County	As noted in previous comments, Alternative D may be the most important, since it is BLM's Preferred Alternative. Some quantification of its impacts on oil and gas and agriculture should be provided, even if only the worst case ("up to") can be estimated.		
117.	5-52	Table 5-6	Fred Jarman	Garfield County	As noted in previous comments, Alternative D may be the most important, since it is BLM's Preferred Alternative. Some quantification of its impacts on oil and gas and agriculture should be provided, even if only the worst case ("up to") can be estimated.		
118.	4-193	27-29	Fred Jarman	Garfield County	The introduction discussion to Fluid Leasable Minerals notes that "decisions ...also apply to oil shale...." Given the national strategic emphasis placed on recovery of these reserves, the known area holding these reserves and the unique development potential of local oil shale deposits, which cannot be replicated elsewhere and that could be of significant economic value, the effect on oil shale prospects deserve far greater attention throughout the document.		

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119.	4-210	6-9	Fred Jarman	Garfield County	“...the result would be to eliminate more than 44,000 wells from future production..” (alt. B) This number of wells, concentrated in a small portion of the geographic area, is a large impact, completely out of scale with the projections of very modest loss of jobs and economic activity. For example: Table 4-15 (page 4-538) suggests a loss of less than 2000 jobs between scenario A and B; and Appendix pages K-34- 38 suggests a loss of only 1800 wells between Alt. A and Alt. B.		
120.	4-210	21-24	Fred Jarman	Garfield County	“...making approximately 733,578 acres of currently unleased federal minerals in high potential areas for oil and gas unavailable for leasing would eliminate more than 73,000 wells...” (alt. B). This number of wells, concentrated in a small portion of the geographic area, is a large impact completely out of scale with the projections of very modest lost jobs and economic activity. For example: Table 4-15 (page 4-538), which suggests a loss of less than 2000 jobs between scenario A and B; Appendix pages K-34- 38, which suggests a loss of only 1800 wells between Alt. A and Alt. B.		
121.	5-4	Table 5-1	Fred Jarman	Garfield County	Table 5-1 identifies the Garfield County Land Use Resolution of 2008 as a “Past, Present, and Reasonably Foreseeable Projects, Plans, or Actions that Comprise the Cumulative Impact Scenario.” Despite this, there is no basis provided for including these land use regulations as a “plan” etc. Table 5-1 also neglected to include the Parachute Piceance Roan Conservation Plan and the Garfield County Greater Sage Grouse Conservation Plan as having an effect on how cumulative impacts are considered.		

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122.	5-14	8-14	Fred Jarman	Garfield County	This sentence should be amended to read: “Data and information that could become available between the Draft EIS and the Final EIS and enable a more comprehensive quantitative analysis may include the following: ongoing <u>state and local</u> land use plan amendments and revisions, state <u>and local</u> plans that may not yet be completed, coordination with states, and agencies, <u>and local governments</u> during consistency reviews, and data from non-BLM-administered lands. Those data that become available will be compiled and included in the quantitative cumulative effects analysis for GRSG in the Final EIS.”		
123.	5-15	Table 5-3	Fred Jarman	Garfield County	Table 5-3: Habitat by Land Status should be revised to include the column header <u>Acres within Suitable Habitat (SH) as mapped by Garfield County</u> and it shall reflect the following totals for surface ownership: <u>BLM: 7,491 acres or 26% of Suitable Habitat</u> <u>Private: 21,313.5 or 74% of Suitable Habitat</u> <u>Total: 28847.8 acres</u>		
123.	5-22	39-41	Fred Jarman	Garfield County	The sentence should be revised to read: “Voluntary protections would continue to be implemented on private land (i.e., NRCS SGI) and in Colorado (i.e., the Colorado Greater Sage-Grouse Conservation Plan, <u>The Parachute-Piceance-Roan Conservation Plan, and the Garfield County Greater Sage-Grouse Conservation Plan</u>),		

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124.	5-29	4-7	Fred Jarman	Garfield County	Rewrite the language in Alternative A such that it reads: "In Colorado, the less-restrictive statewide Conservation Plan would likely mean that threats would continue to worsen in that portion of the Management Zone unless local working groups, <u>counties, private land owners, and state and federal agencies coordinated together</u> to developed protections <u>including incentives and best management practices that are consistently implemented across broad areas such as what is contained in the Garfield County Greater Sage-Grouse Conservation Plan and the Parachute-Piceance-Roan Conservation Plan.</u>		
125.	5-30	9	Fred Jarman	Garfield County	Add after the last sentence: <u>Additionally, this balanced approach is further demonstrated and supported by the policies and principles contained with the Garfield County Greater Sage-Grouse Conservation Plan and associated Suitable Habitat mapping that are included within this DEIS as a sub-component specifically as applied to the land area located within the political boundaries of Garfield County.</u>		

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126.		Exhibit L	Fred Jarman	Garfield County	<p>The cover letter from DNR states: <i>“This will be an iterative process. As stakeholders review the compiled material in the Package, they may notice gaps or inaccuracies. Those edits should be sent to Lisa Dale (lisa.dale@state.co.us) for inclusion, and revised versions of the document will be shared with FWS.”</i> Garfield County sent DNR the Garfield County Greater Sage-Grouse Conservation Plan on March 22, 2013 as a result of an earlier email from DNR that stated: <i>“We would very much like to be able to include inputs from Garfield County, and I am happy to include information about new policies when you submit them...but bear in mind that we still have plenty of time before the FWS will be making a listing proposal and we expect to provide new information as needed over the next year or more.”</i> Despite this email and our asking DNR to include it, DNR has not updated the Colorado package to reflect this new set of policies and mapping.</p> <p><u>Requested Action:</u> If the DEIS is publically released and relies on the Colorado Package as it is currently drafted, that document should be revised to include all of Garfield County’s recently adopted Greater Sage-Grouse Conservation Plan. As it currently exists, it does not.</p>		

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127.	E-1	4	Fred Jarman	Garfield County	Appendix E: It states “The subregional alternative...” which should be replaced with “ <u>Alternative D...</u> ”. Also, we request adding the following at the end of that paragraph on Line 8: <u>However, note that the disturbance caps discussed herein do not apply to the areas with the political boundaries of Garfield County. Rather than an arbitrary percentage cap management tool, Garfield County uses a ‘cause and effect’ approach to specific threats. Specifically, Garfield County utilizes an avoidance policy for areas defined and mapped as Suitable Habitat and uses an NSO of 0.6 miles around an active lek that is not located in Suitable Habitat. For these areas refer t the Suitable Habitat map as defined and mapped by Garfield County.</u>		
128.	Appendix C on page 3	10	Fred Jarman	Garfield County	At the end of Section 1 in Appendix C: Figures: Add a new figure, Figure 1-6 , as the <u>Suitable Habitat Map for Lands within the Political Boundaries of Garfield County</u> as adopted by Garfield County and which is contained in the Garfield County Greater Sage-Grouse Conservation Plan. (See last page of this document.)		

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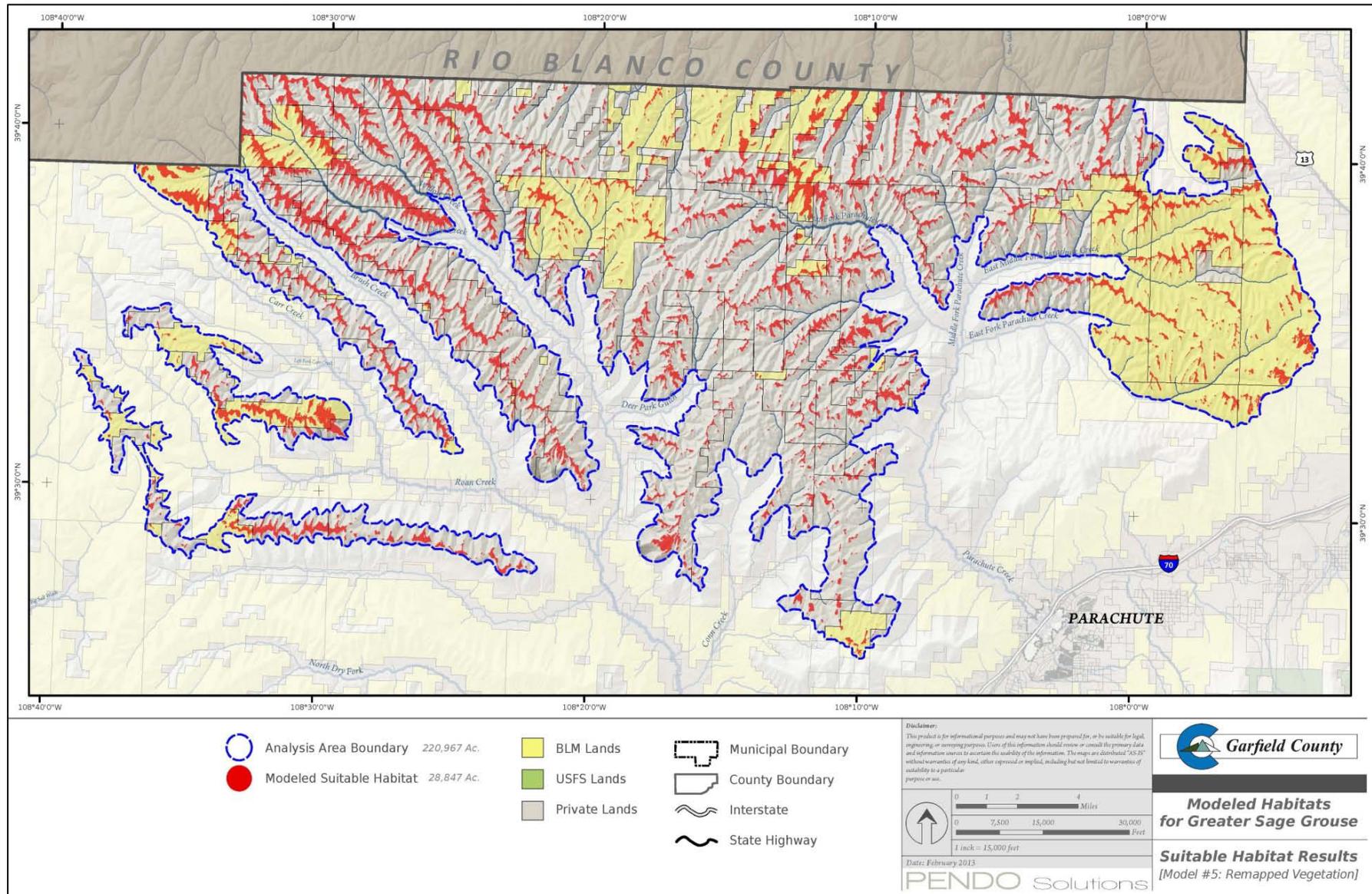
Cmt #	Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M¹	Response / How Resolved <i>(Reviewers: Leave this column blank)</i>
129.	2-5 and 2-6	27-40 and 1-24	Fred Jarman	Garfield County	On page ES-9, The EIS states as a part of the planning criteria that “The RMPAs will be limited to making land use planning decisions specific to the conservation of GRSG habitat.” However, under the discussions of alternatives, the EIS has included in Alternative D the designation of a utility corridor: “Included under Alternative D, and consistent with 43 CFR 2802.11, the BLM proposes to designate a new utility corridor through the LSFO in order to provide a siting option through northwestern Colorado for utilities, while at the same time avoiding as much PPH as possible.” (Draft EIS 2-5). This has not been included in any of the other alternatives and it directly conflicts with the criteria above. Garfield County requests that the proposed Utility Corridor be removed from Alternative D because it conflicts with the planning criteria.		

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Figure I-6: Suitable Habitat (SH) located within the political boundaries of Garfield County



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