



December 1, 2014

Ruth Welch
Colorado State Director
Bureau of Land Management
2850 Youngfield Street
Lakewood, Colorado 80215-7093

Joe Meyers
Northwest District Manager
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

RE: First Amendment to the Garfield County Greater Sage-Grouse Conservation Plan

Dear Director Welch and District Manager Meyers,

Under cover of this letter, Garfield County Board of County Commissioners (the Board) is pleased to provide you with a copy of the First Amendment to the Garfield County Greater-Sage Grouse Conservation Plan (the Plan) adopted by the Board on Monday, November 17, 2014.

The purpose of the Plan is to “provide private and public land owners with land management principles, policies, 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.” As such, this Plan continues to guide all projects, plans, policies, conservation measures and best management practices for the Greater Sage-Grouse (sage-grouse) in Garfield County.

There are three primary amendments to the Plan in this First Amendment that include the following:

- 1) The Plan now incorporates the results of the recently completed and scientifically peer reviewed Manuscript (the Manuscript) entitled, *“Use of Modelling in a Geographic*

Information System to Predict Greater Sage-Grouse Habitat” completed by Zach Purdue and Eric Petterson, November 4, 2014. The abstract to the Manuscript is stated here for convenience:

ABSTRACT *In Colorado (and across many western States) the Bureau of Land Management (BLM) is in the process of producing a greater sage-grouse (Centrocercus urophasianus [sage-grouse]) Resource Management Plan Amendment/ Environmental Impact Statement (RMPA/EIS) for the BLM’s Northwest Colorado District, to assess impacts of potentially implementing sage-grouse habitat management conservation strategies (BLM 2013). If approved, the RMPA/EIS would amend current BLM Resource Management Plans and U.S. Forest Service Land and Resource Management Plans that would guide the management of greater sage-grouse habitat on public lands administered by the BLM and the U.S. Forest Service and on private lands with a federal nexus to the BLM planning process (e.g., projects extracting federal minerals or accessing federal lands across private lands).*

A key component of implementing sage-grouse conservation strategies is accurately predicting where sage-grouse habitat occurs; however, the current sage-grouse Preliminary Priority Habitat and Preliminary General Habitat used in the RMPA/EIS was in large part based on habitat modeling conducted at large scales (Doherty et al. 2010, Rice et al. 2013), which makes land use planning, accurate impact assessments and project implementation at the project level difficult due to the inherent inaccuracies of large scale habitat maps. We employed two different methods to map and quantify at a finer and more accurate scale the extent of suitable sage-grouse habitat found in Garfield County, Colorado. We started by mapping vegetation at a 2 m cell resolution in order to capture nuances in sage-grouse habitats given sage-grouse preference of habitat at smaller scales (Connelly et al. 2000, Hagen et al. 2007), and then employed: (1) a weighted overlay as a habitat suitability index (HSI) using a resource selection function (RSF) and (2) fuzzy modeling at 10 m cell resolution. We validated this technique against tracked (i.e., radio-collar and Global Positioning System [GPS]) sage-grouse as well as data from previous pedestrian surveys documenting where evidence of sage-grouse occupancy had occurred.

(Note, the Manuscript, in its entirety, is located in Appendix B, but is also incorporated where appropriate into revised Chapters 2: Plan Area, Chapter 3: Habitat Mapping, Modeling and Methodology, and Chapter 4: Plan Implementation. Ultimately, both model results indicated there are approximately 72,847 to 73,390 acres of suitable habitat in the Plan Area.)

- 2) The Plan includes updated information regarding the threat of predation resulting in adding an additional policy, Policy B which is restated here for convenience:

Encourage public agencies such as CPW, the BLM, and the USFWS to work with private land owners in areas of known Suitable Habitat to better understand the actual predation threat, then collaborate on the implementation of predator mitigation programs that discourage predators, reduce productivity and recruitment of predators, and reduce predator density.

(This updated information can be found in Section 5, Chapter 6: Policies.)

- 3) Chapter 4: Plan Implementation has been updated to include a new map identified as **Figure 5: Greater Sage Grouse Management Plan Areas** (MPAs). The purpose of this new map is to identify suitable habitat to be used for land use management purposes which was created from the combined results of the Weighted Overlay model using a Resource Selection Function and the Fuzzy model performed in the Manuscript. This map represents that there are approximately 74,819 acres of suitable habitat on private lands and approximately 19,076 acres of suitable habitat on public lands within the study area.

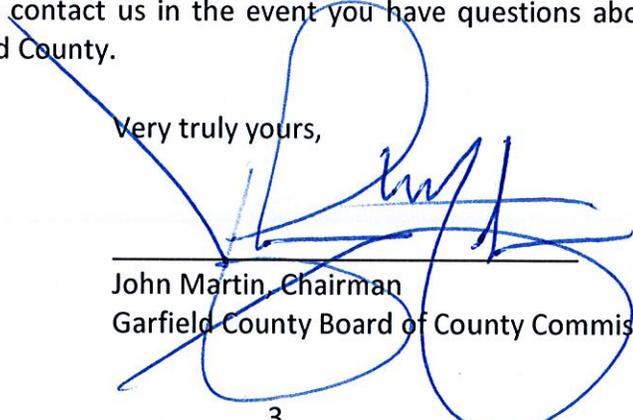
The Board placed considerable time and resources in developing this Plan and its subsequent First Amendment to ensure that the policies and suitable habitat mapping therein are based on the best available science and are relevant to Garfield County's unique topography. Importantly, this First Amendment continues to follow the Plan's adaptive management principles as it now incorporates the recently completed habitat modeling in the Manuscript which represents unsurpassed best available science to date for suitable habitat in Garfield County.

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 that are proposed in the BLM's EIS as well as contained in other documents such as the National Technical Team (NTT) report and the Conservation Objectives Team (COT) report. By this letter, we continue to respectfully request that the BLM incorporate this Plan, as amended as you move forward in preparing the Northwest Colorado Greater Sage-Grouse Environmental Impact Statement (EIS) to a Record of Decision.

More specifically, we also continue to request that this Plan, as amended be included as the preferred alternative for the Garfield County portion of the BLM's EIS because the policies and suitable habitat within the Plan are best suited to manage the habitat and the species 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 local policies and plans, 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.

Please do not hesitate to contact us in the event you have questions about the Plan and its implementation in Garfield County.

Very truly yours,



John Martin, Chairman
Garfield County Board of County Commissioners

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*Board of County Commissioners
Frank Hutfless, Garfield County Attorney
Andrew Gorgey, Garfield County Manager
Fred Jarman, Director, Community Development Department*

Attachment(s)

First Amended Garfield County Greater Sage-Grouse Conservation Plan