



December 2, 2013

James Cagney
NW Colorado District Manager
Bureau of Land Management
2815 H Road
Grand Junction, Colorado 81506

Re: Garfield County Comments concerning the BLM's Northwest Colorado Greater Sage Grouse Draft Resource Management Plan and Draft Environmental Impact Statement

Dear Mr. Cagney,

Under cover of this letter you will find specific comments (attached as ***Exhibits A through Q***) prepared by Garfield County (the County) concerning the Bureau of Land Management's (BLM) Northwest Colorado Greater Sage Grouse Draft Resource Management Plan and Draft Environmental Impact Statement (DEIS). Garfield County appreciates the ability to provide these formal comments to the BLM on such an important issue. All of the attached exhibits are considered specific critical comments in the DEIS including scientific analyses, socio-economic analyses, reports, regulatory compliance analyses, letters from concerned special districts, and technical mapping documents and letters. All of these documents combined comprise Garfield County's formal response to the BLM's DEIS.

As you are aware, the County participated as a Cooperating Agency as the BLM crafted the four alternatives prior to its public release. Additionally, the County hosted five Coordination meetings with a variety of state and federal agencies including the BLM in order to provide a forum to attempt to point out and resolve inconsistencies between the BLM's planning efforts and local efforts by Garfield County. Unfortunately, despite the County's sincere efforts to work closely with the BLM, these inconsistencies between the BLM's DEIS and the County's Greater Sage Grouse Conservation Plan remain unresolved.

The County has performed an in-depth review of the DEIS including not only an analysis of the proposed alternatives and the associated GSG habitat maps but also a thorough review of the socio-economic impact analysis. As a result of this review and as a general comment, the County finds the DEIS has failed to meet its legal obligation to provide a reasonable range of alternatives by

excluding County's Greater Sage Grouse Conservation Plan within the range of alternatives and has not adequately identified the socio-economic impacts to our communities in Garfield County.

If, in fact, the goal of the preferred alternative in the DEIS is to provide the US Fish and Wildlife Service (USFWS) with enough 'regulatory assurance' so that a determination can be made to list (or not) the species as threatened or endangered as has been portrayed by the BLM in multiple Cooperation Agency meetings and Coordination meetings, then the County asserts the DEIS has soundly missed that objective. As a cursory sample regarding some of these issues that are discussed more fully within the body of the County's comments, we offer the following significant failures of the DEIS.

A. Inability to Adequately Define GSG Habitat

The DEIS contains a host of contradictory statements on what is habitat, how it will be quantified, and who will make that determination. It introduces a vague and ambiguous management strategy which significantly impacts activities on private lands outside of the regulatory authority of the BLM. As demonstrated in a letter to Mike King, Executive Director of the Colorado Department of Natural Resources (**Exhibit D**), CPW admitted that the Preliminary Priority Habitat map (PPH) was based on their own Sensitive Wildlife Habitat (SWH) map which was used as a tool for consultation created at a 50,000-foot level and not specifically identifying actual habitat types. Unfortunately, the DEIS continues to use that very broad map as a basis for specific 'on the ground' land management policies assuming it accurately defines habitat for the Greater Sage Grouse (GSG); however, the DEIS contains significant and wildly contradictory statements such as the following:

- Pg. 226: *"GRSG are considered a sagebrush ecosystem obligate species. Obligate species are those species that are restricted to certain habitats or to limited conditions during one or more seasons of the year to fulfill their life requirements. GRSG are only found where species of sagebrush exist."*
- Pg. 245: *"As is the case with the North Eagle/Southern Routt population on the east side of the CRVFO, the Roan Plateau is at the southernmost part of the range for this species. It is incorporated in the Parachute-Piceance-Roan population. Although the area is mapped as preliminary general habitat (PGH), it does not contain large contiguous sagebrush stands."*
- Pg. 256: *"Adding to this vulnerability, the Parachute-Piceance-Roan population is distributed in clusters across the Piceance Basin and Roan Plateau...Although CPW monitoring of telemetered birds has established that there is regular, but infrequent, interchange among these groups, the large interval of land separating these subgroups (about 9 miles) is relatively devoid of suitable habitat...Habitat potentially suited for use by Parachute-Piceance-Roan GRSG comprises only 16 percent of the mapped overall range."*
- Pg. 507: *"Not all habitats within mapped priority and general GRSG ranges are capable of supporting GRSG populations."*

As you also know, the County provided a much more refined habitat map (attached as **Exhibit B**) that conflicts with the BLM’s PPH / PGH map which is contained in the County’s GSG Conservation Plan and as Appendix D of the DEIS and attached to our comments; yet the BLM has not resolved the conflicts between the two mapping efforts to date despite the enormous contradiction in literature citations and CPW’s revised position that the PPH map is a consultation tool and contains large areas of non-habitat. As a simple visual illustration, consider the following photos that contrast the Pinedale, WY region (purported to represent the best available science as stated in the NTT report and basis for BLM’s management policies) versus the landscape in Garfield County which was described in the literature and quoted above from the DEIS as having **only 16% habitat**, etc., despite the current mapping in the DEIS:

Pinedale Wyoming
Example of Priority
Habitat cited as
basis for the NTT
Report →



← Example local
landscape in
Garfield County
mapped as “Priority
Habitat”

B. Lack of Regulatory Assurance

The DEIS fails to meet the **Purpose and Need** of protecting sage-grouse and its habitat, as it allows numerous loop-holes regarding measuring habitat, measuring habitat impacts, and who will

conduct such monitoring. It introduces numerous occasions where the “authorized officer” may introduce their own opinion on the social merit of a project with a BLM nexus regardless of the impact to sage-grouse habitat. To achieve the ‘regulatory assurance’ the BLM is hopeful for, the DEIS should accurately define what is habitat, where it is, and how it would be managed. Currently, because the DEIS is so vague and misleading, it is difficult to either navigate a process to conduct activities in PPH/PGH areas, or be assured that ‘real’ habitats would actually be protected. For example, see the following excerpt from Page F-3 of the DEIS:

The initial calculations and the analysis in this document are based on sagebrush maps created using the Regional GAP Analysis Project data, but implementation would be based on site-specific information wherever it is useful. Areas currently dominated by sagebrush, or specially identified by CPW as contributing to the health of GRSG populations (emphasis added), ***would be included in the analysis and calculations, independent of ecological site maps.***

This statement introduces regulatory uncertainty to any applicant or agency staff in managing sage-grouse habitats. This statement diverges from previous statements where "***The reference to ecological sites supporting sagebrush is intended to focus disturbance cap management on the most preferred sagebrush habitat***" (pg. F-1). The inclusion of this statement and others such as "***...or specially identified by CPW as contributing to the health of GRSG populations***" affords great discretion to an authorized officer in determining the areas that are managed under the disturbance cap management program; this allows for areas to be managed under the program that are deemed suitable habitat based solely on the judgment of BLM. Accepting the statement on page 226 of the main DEIS as true, "***GRSG are only found where species of sagebrush exist.***" The County continues to question why would other vegetation communities be proposed to be managed under the disturbance cap management program? This remains a fundamental problem in how the DEIS has attempted to attach poorly crafted specific local land use policies to a very broad ‘habitat’ map produced by CPW.

C. Implementation of the Alternatives

The County is concerned about actual implementation of the alternatives contained within the DEIS. For example and related to the points made directly above, what entity would be responsible for providing site-specific information regarding what is truly habitat? If CPW or the BLM, would they re-map habitats? Would a project proponent be responsible to collect site-specific information? Who would determine what is habitat? Would it be data from the WAFWA report or ReGAP or the PPH/PGH maps? If a project proponent expends significant time and resources to provide site-specific data, would CPW/BLM accept this information even through CPW did not "specifically identify" the site-specific information? This places a significant burden on project proponents, with no or at least very vague guidance on how site-specific information would be collected, who would review it, and what the definition of effective GRSG habitat actually is, given the DEIS utilizes multiple maps showing significant differences in what habitat really is, but all maps claim to be "defining" habitat. How is the USFWS able to judge protection of habitat if no one really knows what habitat is?

D. Lack of Basis for Stable & Healthy Population

The County finds the DEIS fails to substantiate the **Purpose and Need** for Colorado GSG populations. The DEIS states "**The need for this LUPA is to establish regulatory mechanisms in BLM and USFS LUPs to respond to the recent "warranted, but precluded" ESA listing petition decision from USFWS**" (pg. xxvi). Multiple evidence presented in the DEIS establishes that the GSG populations in Colorado are at minimum stable, and more likely, increasing as directly quoted in the DEIS:

- Pg. 252: *"The overall results indicated that lek size has decreased, but populations have increased in Colorado."*
- Pg. 253: *"Populations in the late 1960s and early 1970s were approximately 0.7 to 1.6 times the current populations (see diagram 3.3, Change in the Population Index for GRSG in Colorado, 1965-2003 (Connelly et al. 2004)) with relatively large population fluctuations."*
- Pg. 253: *"Although GRSG populations have definitely declined nationwide, the GRSG in Colorado have been increasing for about the last 17 years, and breeding populations have not declined for the last 39 years."*

As has been established above, the DEIS fails to identify or determine what habitat types benefit the bird versus what types does not. To correct this, the DEIS should have developed a specific GSG habitat definition so that readers can actually understand what characteristics birds seek out for utilization and so that potential developers can understand what to look for, avoid and protect. Along the same lines, if the primary objective is to maintain a healthy and stable GSG population, then the DEIS also needs to quantify what constitutes a healthy population. Most recently, CPW hosted a meeting in Rifle, Colorado on 11/20/13 in which Dr. Brett Walker specifically stated that CPW does not know what the base population is of GSG in the Parachute-Piceance-Roan (PPR) area despite their work on lek locations, etc. To date, while CPW appears to understand the 'high male lek count', there is no information in the DEIS that defines a healthy and stable population in NW Colorado.

E. Socio-Economic Impacts

One of the most critical flaws in the DEIS is its failure to properly characterize and identify the socio-economic impacts to communities in NW Colorado for each alternative. Perhaps the most single key concern is the fact that the DEIS does not recognize that oil and gas development occurs across multiple jurisdictional boundaries (public lands, split-estate, and fee simple lands) and does not fit neatly into lands only managed only by the BLM. The result is that the DEIS has ignored an enormous amount of oil and gas development activity on private lands due to the nature of their development (projects with a federal nexus, etc.) that are clearly subject to management policies contained in each of the action alternatives. As such, the alternatives are either silent on or severely underestimate the resulting impacts which directly impact communities in NW Colorado.

Of equal importance is the effect the alternatives will have on tax revenue attributable to oil and gas development to local governments. The DEIS simply states (pages 906-907), "...the largest

impact of management alternatives on county fiscal revenues would be through taxes paid by the oil and gas sector.” The County agrees with that statement; however, after making that statement, there is no further discussion about the impacts of the alternatives on County revenues and no comparison of the effects of the alternatives. While the DEIS is silent beyond making this statement on impacts to counties, it also does not address the impacts on other service districts that support communities such as fire districts, school districts, and hospital districts to name a few. (Please refer to **Exhibits E – L** which comprise letters from concerned municipalities and special districts in Garfield County.)

In comments prepared by BBC Research and Consulting (attached as **Exhibit C**) on behalf of the County for the review of this DEIS, they note that *“Impacts on county revenues, particularly property taxes, are a major concern for the oil and gas producing counties, where oil and gas properties can be the largest source of county revenues. On a proportional basis (relative to overall sources of revenue) these effects would be much larger for the affected counties than the changes in state severance tax revenues or federal royalties (which are estimated in this section) would be to the State of Colorado or the federal government. Some effort to quantify these effects on county revenues is crucial in the interest of disclosing the socioeconomic effects of the alternatives.”*

“To further emphasize the importance of this issue, the Garfield County Assessor’s office recently examined the current contribution of oil and gas properties to the local tax base. That analysis revealed that more than 70 percent of the tax base (assessed property value) for the County government and the RE-2 school district was attributable to oil and gas properties, while more than 90 percent of the tax base for School District 16 was attributable to oil and gas. The analysis also identified a number of fire and hospital districts that rely on oil and gas properties for at least 75 percent of their assessed value. All told, oil and gas related property tax revenues contributed a total of over \$90 million in 2012 to the County and at least 10 other local government jurisdictions in Garfield County.” However, the DEIS is silent on the impact the action alternatives will have on these revenues. It is estimated conservatively that approximately \$218 Billion of oil and gas reserves in the Piceance Basin in Garfield County will be directly impacted by the action alternatives in the DEIS; as a result, the County and other special districts (school, fire and hospital) stand to lose significant revenues from gas production tax over the next 25 years. Note this does not provide an anticipated loss to the special districts and their ability to continue to provide services even though they depend almost exclusively (in some cases near 95%) on tax revenues directly attributable to oil and gas development in their districts. It is the services (education, fire protection and medical services, etc.) they provide to our community which is at stake in the DEIS.

To amplify these issues and to point out the shortcomings of the DEIS, BBC Research and Consulting prepared a report (attached as **Exhibit C**) whose objective is to demonstrate the potential economic consequences for Garfield County of BLM’s implementation of the proposed Sage-Grouse habitat preservation plans and thus restricting the development of natural gas reserves in the Piceance Basin. Further, this report is not meant as a substitute analysis for the BLM’s study, but rather a simple demonstration of the order of magnitude economic impacts to Garfield County that were not documented or revealed in the EIS. It is hoped that representation presented here can illuminate the EIS’s shortcomings and the magnitude of the document’s missing information.

F. Failure to Consider a Reasonable Alternative

Earlier this year, Garfield County adopted the Garfield County Greater Sage-Grouse Conservation Plan. This plan was developed to ensure the conservation measures implemented were appropriate for the unique landscape and culture of the county, which is unlike any other habitat in the eleven state ranges of the grouse. The county also developed this plan so that there would be coordination among all of the agencies and governments with jurisdictional responsibilities for the habitat and the species.

NEPA regulations require your agency to “study, develop and describe alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” (40 CFR 1507.2) It is concerning to us that after reviewing the Garfield County Plan, it was not carried forward as a reasonable alternative for the lands within the jurisdictional boundaries of Garfield County.

The plan, properly compared with the other alternatives, provides the most protection to the greater sage-grouse, while also ensuring the productive use of the land will continue. Under the Garfield County plan, the County could continue to operate from current funds derived from oil and gas exploration and production well into the future and continue to ensure the protection of our citizens, their property and the greater sage-grouse. This plan demonstrates that the grouse and the people can be fully protected without sacrificing human protection. It should have been fully considered and not summarily dismissed.

Rigorous analysis and comparison of the Garfield County plan would have helped to sharply define the issues, “providing a clear basis of choice among options by the decision makers and the public,” (40 CFR 1502.14) as required under the NEPA rules. This currently does not exist in the comparison of alternatives carried forward. The action alternatives (B-D) vary only slightly from each other.

They are all a variation of the NTT approach mandated to be included by the Secretary of Interior as the policies preferred. Alternative B is the NTT alternative where these conservation measures are specifically carried forward. Alternative C is a more restrictive version of these same NTT policies. Alternative D is a slightly less restrictive alternative based on the same NTT principles.

There are no sharply defining issues that show clear distinctions between the three action alternatives. They all carry forward the NTT approach in some fashion. Only the Garfield County Plan offers any distinction in how to develop and implement conservation measures for the protection of the grouse. However, you failed to analyze or consider this a reasonable and preferable alternative.

Section 2.6.2 points out that “The alternative is presented in Appendix D...but has not been analyzed in detail primarily because it is contained within the existing range of alternatives...Consequently, the public is asked to review the Garfield County alternative and provide comments.” A closer review of the action alternatives revealed that none of the Garfield County policies in the Garfield County Plan were incorporated within the range of alternatives.

Moreover, the BLM shirked its NEPA required responsibilities to thoroughly analyze the County's Plan and, instead, shifted that duty to the public contrary to its federal requirements.

G. Summary of Fundamental Concerns regarding the DEIS

- 1) The BLM and USFS should make it clear to the DEIS readers including USFWS, that the existing RMP and LUP provide a plethora of regulatory mechanisms to manage and protect GRSG habitat as well as other multiple use objectives. This remains a fundamental failure of the DEIS by refusing to disclose this in the No Action Alternative.
- 2) The DEIS contains a great deal of opinion that is not backed up by any demonstrated scientific results. More concerning is the fact that the DEIS authors appear to have extrapolated science from other areas and arbitrarily applied it to NW Colorado and the PPR region. This is a constant theme throughout the DEIS. For example, there is virtually zero evidence provided in the literature that clearly demonstrates oil and gas activity is an actual threat in the overall range, NW Colorado, or Garfield County; rather, it appears that it is unfounded opinion not justified by science.
- 3) The scientific justification for requiring 4-mile buffers and surface disturbance caps (whether they are 1, 3, or 5%) is entirely based on the opinions of selected authors (some of whom were NTT members) and the erroneous assumption that a local and temporary displacement of sage grouse from an area of development means that a population decline has occurred. However, none of the cited studies actually ever documented a population decline. (Please refer to **Exhibit M** entitled "How the National Technical Team Report Changes the Way the BLM Operates" which is a compilation of internal BLM emails obtained through a Freedom of Information Act (FOIA) request that points out the internal BLM's own concern over lack of scientific data to support claims in the NTT report which is the very basis for the action alternatives in the DEIS.)
- 4) Neither the DEIS or the NTT Report acknowledge that that there has been no population-level decline reported in any of the cited studies, only decreased lek attendance in affected areas. The DEIS needs to be revised to explicitly acknowledge these facts and alternative hypotheses that are consistent with the data.
- 5) The DEIS provides little in the way of actual "regulatory assurance" sought by the USFWS for protections of habitat; rather the alternatives provide total discretion to "authorized officers" in the field without any published or publically available clear standards or criteria to make decisions. A thorough weighing of existing rules and regulations currently at the command of the BLM may, in fact, provide sufficient regulatory assurance sought by the USFWS; however, the BLM ignored providing this information in the No Action Alternative.
- 6) The DEIS does not provide habitat mapping that addresses "local ecological site variability" for the areas in Garfield County and NW Colorado that was required by the BLM Director in the Instructional Memorandum 2012-044. Garfield County provided a plan that specifically addressed local ecological site variability which was ignored by the BLM.

- 7) The DEIS, despite recent sound scientific studies, as pointed out in **Exhibit Q** by Dr. Ramey II attached hereto, has neglected to address one of the most the significant issues: **Predation**. This issue was continuously raised by many of the Cooperating Agencies during the scoping of the DEIS, but was summarily dismissed by the BLM as an issue that belonged to CPW and not the BLM as part of the DEIS.
- 8) The DEIS failed to consider and properly analyze the Garfield County GSG Conservation Plan as required by NEPA in the set of alternatives.
- 9) The current set of proposed action alternatives (B-D) do not provide a wide set of policy alternatives; rather they are only slight variations of the NTT report.
- 10) The DEIS does not provide a basis or define what a “healthy and stable” population is in the PPR region in Garfield County; as a result, there no established population baselines or goals to reach. This was recently reiterated by CPW’s Dr. Brett Walker in their meeting held in Rifle on 11/20/13 where he explained that CPW does not know what the population is the PPR region.
- 11) The PPH / PGH habitat maps provided by CPW map large areas of non-habitat in Garfield County despite cited literature and specific text in the DEIS that directly contradict the mapping. This results in CPW erroneously mapping 160,000 acres of non-habitat as “habitat.” Recent mapping completed by CPW (Dr. Brett Walker) appears to be very consistent with Garfield County’s mapping which revealed large areas of non-habitat that are currently in the PPH / PGH maps.
- 12) The DEIS erroneously applies specific local landscape management policies in the action alternatives to a broadly crafted and coarse 50,000-foot view consultation map provided by CPW resulting in policies applying directly to non-habitat.
- 13) As a practical matter, the DEIS action alternatives provide virtually no information on how or who implements the specifics of the policies.
- 14) The socio-economic impact analysis fails to accurately characterize fundamental socio-economic components of each alternative and therefore significantly underestimates impacts to our region, county and cities and towns.
- 15) The DEIS glosses over (1 page in 1,000) one of the most critical socio-economic impact issues concerning financial impacts to taxing entities that provide services to our local communities. Tax revenues from natural gas development directly fund and improve our community by directly funding education, fire protection, medical services, county road infrastructure improvements, etc. for residents in Garfield County, yet the BLM did not coordinate with these local governments as required by NEPA and FLPMA. The impacts of their current alternatives will have devastating effects on these services.
- 16) Because the socio-economic impact analysis was so deficient, BBC Research and Consulting produced a Supplement Report (**Exhibit C**) with the objective to...

Demonstrate the potential economic consequences for Garfield County of BLM's implementation of the proposed Sage-Grouse habitat preservation plans and thus restricting the development of natural gas reserves in the Piceance Basin. Further, this report is not meant as a substitute analysis for the BLM's study, but rather a simple demonstration of the order of magnitude economic impacts to Garfield County that were not documented or revealed in the EIS. It is hoped that representation presented here can illuminate the EIS's shortcomings and the magnitude of the document's missing information.

- 17) Despite our efforts as a Cooperating Agency and through our sincere attempts to coordinate with the BLM, the BLM refused to follow NEPA and include the County Plan as an Alternative in the DEIS.
- 18) The BLM's DEIS attempts to assert its management authority on private lands through the Disturbance Cap Management program; this directly impacts activities on 1/4 of privately held lands in Garfield County without the legal authority to do so. If the BLM believes it has the legal authority to implement this program, it should disclose its legal arguments in the DEIS.

H. Summary

In summary, for all these reasons above as well as the very detailed comments contained in all the exhibits attached to this letter, Garfield County specifically requests that a supplemental statement should be prepared to properly consider the local impact of the proposed action on the human and natural environment. This supplemental statement should be prepared in coordination with Garfield County and other local governments for the purpose of resolving the conflicts with our policies and to ensure all reasonable alternatives are considered which would include a rigorous analysis of the Garfield County Greater Sage-Grouse Conservation Plan.

If implemented, the proposed action, the action alternatives (based from the NTT report) would represent a violation of BLM's multiple use mandate and a violation of the public trust in that agency to protect human life and property as its first priority. Just as it is the BLM's mission to "sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations," it is our mission to protect the health, safety and welfare of our citizens.

To amplify the significance of the impacts that will result from the draft policies contained in the DEIS, even BLM Staff admits (in box below) in an email exchange between BLM's Jim Perry, Senior Natural Resource Specialist, and other BLM Staffers (see **Exhibit M**) as to the ultimate significance of the policies as contained in the NTT:

Overall, the NTT Report conservation measures are complete game-changers for any actions within the Priority Habitats where there are valid existing rights and showstoppers for those actions where there are no valid existing rights.
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The BLM's failure to coordinate this DEIS with Garfield County has placed the County in a very difficult situation should you not consider our needs given the extraordinary impacts that will result

from the policies in the DEIS as noted by the BLM in the email excerpt above. We implore the BLM to delay approval of the proposed action and instead prepare a supplemental statement which takes these concerns into account. These comments are only a summary of our concerns and not a complete analysis of the conflicts we find in the DEIS as those are contained in the documents attached hereto. We look forward to be able to meaningfully coordinate with the BLM to resolve inconsistencies in the DEIS with Garfield County's local land use policies.

Very truly yours,

John Martin, Chairman

Board of County Commissioners

Mike Samson, Commissioner

Tom Jankovsky, Commissioner

cc: The Honorable John Hickenlooper, Governor, State of Colorado
The Honorable Mark Udall, U.S. Senate
The Honorable Michael Bennet, U.S. Senate
The Honorable Scott Tipton, U.S. House of Representatives
The Honorable Bob Rankin, State House of Representatives
Neil Kornze, Acting Director, Bureau of Land Management
Tom Tidwell, Chief, U.S. Forest Service
John Mehlhoff, Acting State Director, BLM, Colorado
Mike King, Executive Director, Colorado Department of Natural Resources
Robert Broscheid, Director, Colorado Parks & Wildlife

Exhibits

A: Specific and detailed Comments to the BLM DEIS

- B: Garfield County Greater Sage Grouse Suitable Habitat Map
- C: Economic Impacts of Sage Grouse Management: Supplemental Report
- D: Letter from Garfield County Commissioners to Mike King dated October 21, 2013
- E: Letter to BLM from the Colorado River Fire Rescue District
- F: Letter to BLM from Grand River Hospital District
- G: Letter to BLM from the Town of Parachute
- H: Letter to BLM from the RE-16 School District
- I: Resolution from the Town of Silt, Colorado
- J: Letter to BLM from the De Beque Fire Protection District
- K: Letter to BLM from the Grand Valley Fire Protection District (Anticipated)
- L: Letter to BLM from the City of Rifle
- M: How the NTT Report Changes the Way the BLM Operates (Internal BLM emails obtained through FOIA)
- N: NW Colorado Sage Grouse Joint Letter dated 11/26/13
- O: Deficiencies in the Northwest Colorado Greater Sage-Grouse Draft Environmental Impact Statement and Draft Resource Management Plan Amendment
- P: Analysis of Compliance of the BLM's DEIS with National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ), and the BLM's own Policies and Procedures
- Q: Memorandum from Dr. Rob Ramey II containing comments on the DEIS