



June 19, 2013

Katie Stevens, Field Manager
Bureau of Land Management
Grand Junction Field Office
2815 H. Road
Grand Junction, CO 81506

RE: *Comments regarding the Draft Resource Management Plan and Environmental Impact Statement for the Grand Junction BLM Field Office*

Dear Ms. Stevens,

Thank you for extending the public comment period for the Draft Resource Management Plan Amendment and Draft Environmental Impact Statement (RMPA EIS) for the public lands managed by the Grand Junction Field Office, Colorado (GJFO). While it has been a significant task to review this document and we hope our resulting comments will be both helpful in the creation of a proposed alternative as well as reflective of the values and opinions of Garfield County regarding the management of our public lands within the GJFO. Thank you for the opportunity to comment.

Garfield County does agree with the multiple use purpose and need for the RMP EIS as stated in ES-2 of Volume 1; however, we find Alternatives B – D do not achieve this purpose. For this reason, Garfield County is reserved to support Alternative A ('No Action') as a default position rather than attempting to create a new tailor-made alternative. As you are aware, 30% percent (or approximately 1/3rd) of the lands managed by the BLM's Grand Junction Field Office are located within the political boundaries of western Garfield County. Because of the significant reduction in acreage (as proposed in Alternatives B – D), that is left for livestock grazing, coal leasing, fluid mineral leasing, Special Recreation Management Areas (SRMAs), and public access routes, these land management decisions will have a measurable socio-economic impact on Garfield County. The Board of County Commissioners (the Board) respectfully requests the BLM carefully consider the following points to inform your decision as to which Alternative will be chosen in a Record of Decision.

I. Comprehensive Travel and Transportation Management

The Comprehensive Travel and Transportation Management component of the RMPA EIS remains a leading issue for Garfield County primarily because of the County's overriding belief that historic

public access routes need to be kept open for access to our public lands which may sometimes cross private lands. In a review of the access routes presented in the RMP EIS, 1) the maps of the routes shown in all the proposed Alternatives are incomplete as they do not acknowledge a wide variety of historic public access routes that exist across public and private lands, and 2) Alternatives B - D close significant amounts of acreage and specific public access routes to public lands. For example, presently, there are 35,300 acres that are "closed to motorized use." Alternative C proposes to close 379,000 acres (or 36%) of lands under BLM management to motorized use. Additionally, changing the management of existing routes to "administrative routes" will effectively close those access routes to the public. To be sure, the proposed closures in Alternatives B-D will have a significant impact on a wide variety of users of our public lands including Off-Highway Vehicle (OHV) recreation user groups such as but not limited to the following:

- **High Country 4wheelers**
- **Colorado Backcountry Trail Riders Alliance**
- **White River Forest Alliance**
- **Sopris Rec Riders**
- **Grand Mesa Jeep Club**
- **Western Slope ATV Club**
- **Book Cliff Cruisers**
- **Book Cliff Rattlers**
- **Outkast Offroad Group**
- **Colorado Canyon Crawlers**
- **Rocky Mountain Sport Riders**

These groups, among many others, currently access these lands for recreational purposes including a very active hunting and fishing community. Loss of access will result in a tremendous loss of enjoyment of these public lands and a substantial impact to local economies. While public access to all routes should be kept open, as the Alternative is chosen, the Board specifically supports keeping the routes open as highlighted on **Exhibit J**).

Regarding public access, the base mapping for public access routes has excluded several relevant documents in forming the base travel maps such as the 1888 Survey Map of Garfield County (**Exhibit A**), a 1910 County Road map (**Exhibit B**), a 1911 County Road Map (**Exhibit C**), the 1925 Colorado Early Trails, Forts & Battlefields Map (**Exhibit D**), and the 1976 Colorado Department of Transportation County Road Numbers Map (**Exhibit E**). The County is concerned that the BLM access route maps approved in any Alternative need to show public access routes as they leave the BLM's planning area and cross county and even state boundaries rather than dead-end at the planning area boundary. By doing so, the map will show existing route connectivity which is also essential to emergency / search and rescue efforts provided by various responders requiring access into remote areas of the County. These early maps identify significant additional public routes and travel ways that should be open, preserved for public access, and reflected on the BLM maps approved in the chosen Alternative.

The base mapping used in the RMP indicates errors in the length and ownership of several County Roads, including but not limited to County Roads 205, 207, 209, 211 and 232 which are located in the RMP planning area. The Board requests the BLM commit to work with the County to amend the forthcoming BLM Travel Management Plan to reflect revised road alignments and routes when evidence can be tendered by the County to demonstrate these are public access routes. Additionally, and regardless of demonstrated ownership, the Board requests that access routes be shown as they cross private property on all maps rather than not being shown at all. (See **Exhibit F** containing seven examples of this concern where the BLM access route disappears across private land. A large County Road and Route Map is attached as **Exhibit G** that shows an even greater amount of these disconnects as well as locked gate data from County research completed in 2001.) If the BLM claims not to have management authority of these sections across private property, the County requests they indicate such on the maps while still showing the physical access route through those lands. In general, Garfield County opposes any alternative that imposes any limitation or restrictions for access to public and private lands throughout this RMP area.

II. Environmental Consequences / Special Status Species: Greater Sage Grouse

The Board has been participating heavily in the BLM's Northwest Colorado Greater Sage-Grouse EIS which is anticipated to be released to the public for comment in August, 2013. The Board also understands that the Grand Junction RMP will be amended with the results of that effort once the Record of Decision has been issued. The County provided a robust set of comments in that EIS that we also provide with this letter as **Exhibit H** because there are areas of Suitable Habitat, as defined by the County, that fall within the planning area of the Grand Junction Field Office. The County specifically requests that this Draft Resource Management Plan Amendment (RMPA) and Environmental Impact Analysis (EIS) for the Grand Junction Field Office be amended to include these comments as well as the policies, best management practices, and mapping contained in the **Garfield County Greater Sage-Grouse Conservation Plan** as part of Alternative A (attached as **Exhibit I**) where it concerns the Greater Sage-Grouse.

By way of example and for the purposes of this letter, Garfield County recently adopted the **Garfield County Greater Sage-Grouse Conservation Plan** which contains a Suitable Habitat Map. The map was created using the best available science including vegetation typing at a 2-meter resolution and was validated against bird locations provided by the Colorado Parks and Wildlife (CPW) showing a high degree of correlation. The Sage-Grouse Habitat Map found in Figure 3-11 in this RMPA EIS is highly inaccurate. The County requests it be replaced with the County's highly accurate Suitable Habitat Map provided as part of **Exhibits H & I** and graphically represented in Figures 1 and 2 below highlighting the area of concern.

Figure 1: County's Greater Sage-Grouse Suitable Habitat Map showing BLM field office planning area outlined in black.

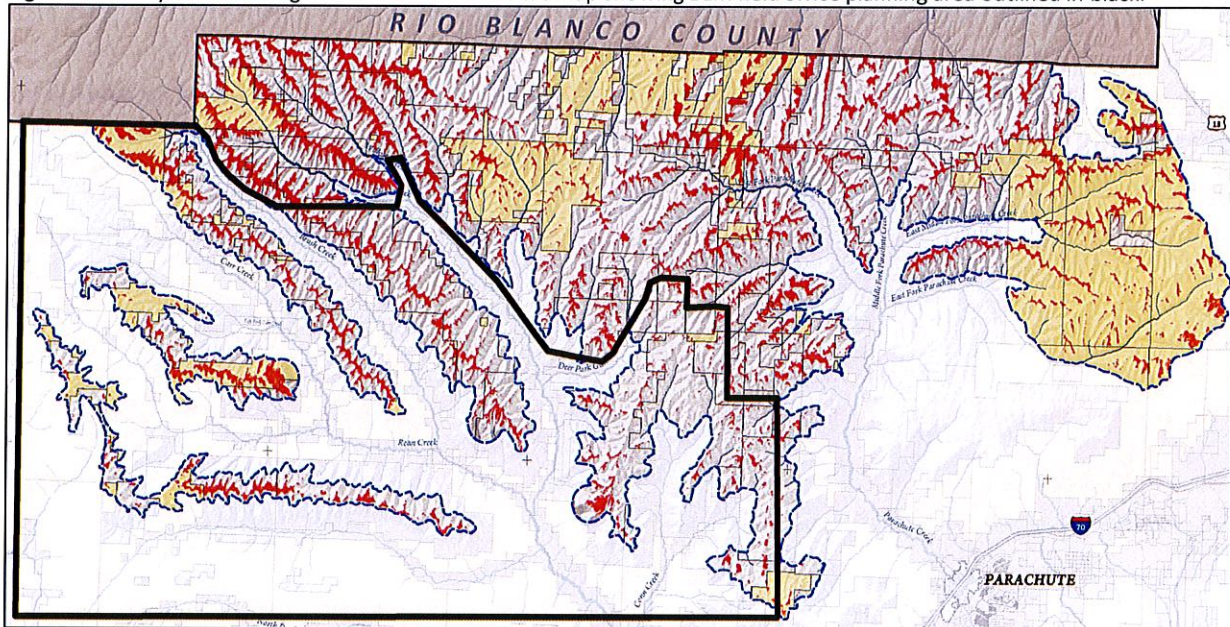
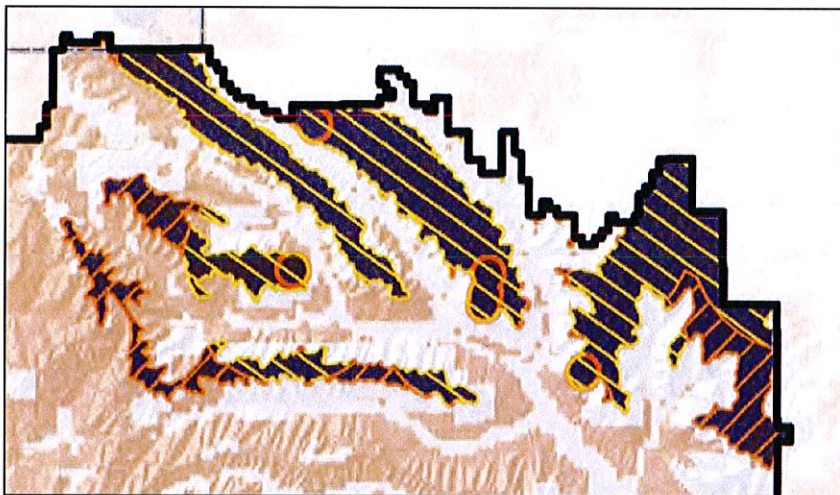


Figure 2: Preliminary Priority and General Habitat Greater Sage-Grouse Map provided as Figure 3-11 in BLM RMP



Correspondingly, the definitions of Preliminary Primary and General Sage-Grouse Habitat listed on page 23 of the Glossary in Volume II of the RMPA EIS should be replaced with the following definition as they not apply to Greater Sage-Grouse habitat in Garfield County:

Suitable Habitat. Suitable Habitat includes all seasonal habitats (including lekking, nesting, brood rearing/summer and winter habitats) within the Plan area. Specifically, Suitable Habitat includes:

- Sagebrush cover is from 10 to 50%
- Cover of Mixed Mountain Shrubs is not more than 20%
- Distance to nearest Forest is over 100 meters
- Distance to Shrubby Woodlands is over 50 meters

- *Grass/forb dominated habitats (with >10% sagebrush cover) within 20 meters of sagebrush habitat*
- *Contiguous habitats >3 acres in size, or part of a block of Suitable Habitats in close proximity*
- *Contain slopes typically less than 20%*

In order for the BLM to remain compliant with the Federal Land Policy and Management Act of 1976 (FLPMA) and the BLM's own rules and regulations, the BLM must fully acknowledge local plans and work to resolve inconsistencies between local plans and the BLM plans. By this letter, the County asserts there are significant inconsistencies between the County's Greater Sage-Grouse Conservation Plan and the information contained in the draft RMP regarding this species. As a result, the County requests the BLM coordinate with Garfield County to resolve those inconsistencies. Regardless of the Alternative ultimately chosen by the BLM, the County requests the provisions contained in the County's Greater Sage-Grouse Conservation Plan be included in that Alternative.

III. Livestock Grazing Allotments

Garfield County supports Alternative A in regards to the management and apportionment of grazing allotments within Garfield County. The ability to graze livestock on public lands is an important part of the local Garfield County economy and therefore the Board recommends the BLM maintain the current inventory of grazing allotments and acreages devoted to those allotments. In general, there should be no net decrease in amount of acreage assigned for grazing allotments.

IV. Fluid Mineral Leasing

Preserving the ability for the oil and gas exploration and production is of great importance to Garfield County due to the positive economic impacts within the County. Garfield County supports limitations on this activity only when the surface or subsurface use may directly conflict with a property that has unique environmental or recreational values such as Special Recreation Management Areas (SRMA), Areas of Critical Environmental Concern (ACEC), or Wilderness Study Areas (WSA). In short, Garfield County supports limiting surface occupancy, controlling surface use, and placing timing limitations on only those areas designated SRMA, ACEC, and WSAs or are designated critical winter habitat that are currently included in Alternative A. Garfield County does not support the creation or expansion of ACES as proposed in Alternatives B-D including the Roan and Carr Creek ACES in Garfield County.

Garfield County is concerned that the rights to develop existing leases under current rules is preserved. Within the RMP EIS, it appears that BLM acknowledges the rights of existing leases to be exempt from stipulations developed for this RMP EIS; however, at the same time, policies within the BLM RMPA EIS seems to suggest that the same/similar restrictions could be applied to existing leases / uses by attaching Conditions of Approval (COA) during the permitting process.

Garfield County is concerned that existing leases be respected and requests that BLM clearly express that existing leases and future permits associated with them are exempt from newly developed stipulations, mitigation requirements and Conditions of Approval that would alter the original lease terms. While the BLM does, for certain leases, retain the right to develop appropriate protective measures as part of the NEPA analysis, Garfield County reminds BLM that permit COAs

such as are discussed in the RMP EIS as a catchall to bring existing lease terms in line with management objectives of this RMP EIS are only allowed if they are justified in the appropriate NEPA documents. To avoid confusion and more clearly define BLM's intent to stay within the bounds of its regulatory authority, we request augmentation of the RMP EIS to plainly state this NEPA-justification requirement for COAs that may be attached to permits for existing leases will be followed.

V. Coal Leasing

The continuation of coal extraction and the ability for coal deposits to be explored and developed is an important economic activity to preserve in Garfield County. To further this goal, Garfield County supports an alternative that includes all areas for coal leasing so long as they are not a designated as a SRMA, ACEC, or a WSA.

VI. Summary

Garfield County agrees with the multiple use purpose and need as stated within the RMPA EIS; however, Alternatives B – D as presently proposed are overly restrictive, do not achieve this purpose, and are in direct conflict with the BLM's own mission statement. Therefore, Garfield County supports Alternative A (No Action) as a default position rather than attempting to create a new tailor-made alternative. As an agency having cooperating status, Garfield County requests the BLM give careful consideration to the comments offered above should the BLM elect to move forward with Alternatives B – D as these alternatives will negatively affect the socio-economic, recreation, and environmental values of Garfield County.

Again, we appreciate the ability to provide the BLM with these comments and are available should you have any questions or comments.

Very truly yours,



John Martin, Chairman
Board of County Commissioners



Tom Jankovsky
Board of County Commissioners



Mike Samson
Board of County Commissioners

*Cc Andrew Gorgey, Garfield County Manager
Frank Hutfless, Garfield County Attorney
Fred A. Jarman, AICP, Director, Community Development Department
Kirby Wynn, Local Government Designee
Mike King, Director, Colorado Department of Natural Resources
Helen Hankins, State Director, Bureau of Land Management
Rick Cables, Director, Colorado Parks and Wildlife
The Honorable Scott Tipton, United State House of Representatives
Representative Bob Rankin, State Representative, District 57*

*Exhibits Exhibit A: 1888 Survey Map of Garfield County
Exhibit B: 1910 County Road Map
Exhibit C: 1911 County Road Map
Exhibit D: 1925 Colorado Early Trails Forts Battlefields Map
Exhibit E: 1976 CDOT County Road Numbers Map
Exhibit F: Seven Examples of potential public / County Road corrections
Exhibit G: May 30, 2013 County Road Map including Routes & Open / Locked Gates
Exhibit H: Comments provided to BLM on NW Colorado BLM Greater Sage-Grouse EIS
Exhibit I: Garfield County Greater Sage-Grouse Conservation Plan
Exhibit J: Alternative A Access Map Highlighting Specific Routes to be kept open*