



## BOARD OF COMMISSIONERS

District 1 – Cody Davis 970-244-1605  
District 2 – Bobbie Daniel 970-244-1604  
District 3 – Janet Rowland 970-244-1606

---

June 11, 2024

U.S. Department of the Interior  
Tracy Stone-Manning, BLM Director  
Director (630), Bureau of Land Management  
1849 C St. NW, Room 5646  
Washington, DC 20240  
Attention: 1004-AE92

To be submitted electronically via BLM Eplanning website: <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

RE: DOI-BLM-WO-2300-2022-0001-RMP-EIS, Greater Sage-Grouse Rangewide Planning Draft Resource Management Plan Amendment and Draft Environmental Impact Statement

Dear Director Stone-Manning:

Thank you for the opportunity to participate as a Cooperating Agency during the Greater Sage-Grouse (“GRSG”) Rangewide Planning Draft Resource Management Plan Amendment and Draft Environmental Impact Statement (“RMPA/EIS”) process. We greatly value our collaborative relationship with the Bureau of Land Management (“BLM”) as outlined in our Memorandum of Understanding (“MOU”), CO-076-97-001. Partnerships between local, state, and federal governments, as well as non-governmental stakeholders is instrumental in appropriately balancing conservation efforts with economic interests within Mesa County, and the greater Western Slope. We offer the following comments and questions on the DRMPA/EIS.

While only a limited portion of Mesa County is designated as general habitat for the GRSG, decisions surrounding land management practices in northwest Colorado significantly affect Mesa County, which serves as the economic hub for western Colorado and eastern Utah. We strongly support our neighboring counties that are most directly impacted by the Resource Management Plan Amendments (“RMPA”) and echo concerns they have identified both in cooperator meetings and in formal written comments.

### Chapter 2 Alternatives

#### *Density Cap*

Mesa County continues to have concerns about the inclusion of the 3% Density Cap and the potential constraints this will place on future infrastructure needs. If a local government needs to address a public safety issue on a roadway within PHMA habitat (realignment that requires ground clearing, addition of a bike lane along a road, etc.), the time and costs related to mitigating below the 3% Density Cap could be prohibitive to completing the project in a timely manner, thereby causing further safety concerns. A similar concern is that there are areas that need additional communication towers for emergency services. We request that an exemption be created for projects related to public health and safety issues.

#### *Compensatory Mitigation*

The sentence “Compensatory mitigation should be durable, ensuring it will be resilient and persist as GRSG habitat (barring any natural disaster), and **should be completed prior to associated actions occurring**

(bolded for emphasis).”<sup>1</sup> Rather than delaying projects indefinitely to ensure the mitigation efforts are successful, we request that, similarly to the compensatory mitigation in Alternative 5 for the Density Cap and Fluid Mineral Lease Stipulation Waivers, Exceptions, and Modification (“WEMS”), the mitigation only need to be “planned, funded, and approved by the operator, BLM, surface owner, and in coordination with the appropriate State agency.”

#### *Renewable Energy Development and Associated Transmission*

It appears that renewable energy projects face less restrictive surface development regulations compared to fluid mineral development. For example, in Alternative 5 (Colorado), a No Surface Occupancy (“NSO”) stipulation is applied to fluid mineral leasing within one mile of active leks in PHMA.<sup>2</sup> Similar setbacks should be applied to renewable energy projects.<sup>3</sup>

The designation of an "avoidance area," as defined in the Glossary, indicates that while a proposed activity may require relocation or redesign to mitigate potential impacts, it does not mean that it is outright prohibited. This could lead to largescale utility projects within GRSG habitat.

If an NSO is enforced for fluid mineral development within one mile of a lek in PHMA, the same restriction should be applied to renewable energy projects. Consistent restrictions should be imposed on all energy-related disturbances to ensure equitable protection of these critical habitats.

#### *Adaptive Management*

Mesa County remains uncertain about the Targeted Annual Warning System (“TAWs”), particularly regarding the management and resolution of triggering soft or hard thresholds. The current RMPA/EIS lacks a clear management response plan beyond conducting causal factor analyses or rapid assessments and considering new authorizations for potential impacts. There is a need for detailed information on the steps the BLM intends to take. Will this approach be a “wait and see” process, or will proactive habitat restoration projects commence to ensure habitat quality remains within acceptable thresholds?

#### *Livestock Grazing*

We request that Management Actions related to grazing emphasize the importance of early and consistent coordination with grazing lessees. Whether renewing a permit that requires a change to a rotation schedule or a reduction in Animal Unit Months (“AUMs”), or addressing an allotment needing a temporary rest after a wildfire, the lessee should be contacted first. This ensures both parties have a clear understanding of the necessary actions and steps required for a successful outcome.

### **Chapter 3 Affected Environment**

#### *Travel and Transportation*

In the text regarding the need for roads currently open to cross country travel to be closed, there needs to be a clarifier that closures will only take place after a public travel management process in accordance to the National Environmental Policy Act (“NEPA”).

### **Glossary Definitions**

In the Alternatives Table 2-4 section titled *Criteria-Based Management for Non-Habitat within GRSG*

---

<sup>1</sup> Bureau of Land Management. (2024). Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement, Volume 1: Executive Summary, Chapters 1—6, Glossary, and Index (p. 2-22). Retrieved May 30, 2024, from [https://eplanning.blm.gov/public\\_projects/2016719/200502020/20105921/251005921/GRSG\\_DEIS\\_Vol1\\_508.pdf](https://eplanning.blm.gov/public_projects/2016719/200502020/20105921/251005921/GRSG_DEIS_Vol1_508.pdf)

<sup>2</sup> Bureau of Land Management. (2024). Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement, Volume 1: Executive Summary, Chapters 1—6, Glossary, and Index (p. 2-49). Retrieved May 30, 2024, from [https://eplanning.blm.gov/public\\_projects/2016719/200502020/20105921/251005921/GRSG\\_DEIS\\_Vol1\\_508.pdf](https://eplanning.blm.gov/public_projects/2016719/200502020/20105921/251005921/GRSG_DEIS_Vol1_508.pdf)

<sup>3</sup> Bureau of Land Management. (2024). Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement, Volume 1: Executive Summary, Chapters 1—6, Glossary, and Index (p. 2-93). Retrieved May 30, 2024, from [https://eplanning.blm.gov/public\\_projects/2016719/200502020/20105921/251005921/GRSG\\_DEIS\\_Vol1\\_508.pdf](https://eplanning.blm.gov/public_projects/2016719/200502020/20105921/251005921/GRSG_DEIS_Vol1_508.pdf)

*Habitat Management Areas*, it is stated that “In the mapped GRSG habitat management areas, there may be areas of non-habitat... (see definitions for existing habitat, potential habitat, and non-habitat in glossary).”<sup>4</sup> However, the Glossary currently includes only the definitions for “habitat,” Priority Habitat Management Area (“PHMA”), General Habitat Management Area (“GHMA”), and Linkage and Connectivity Habitat Management Area (“LCHMA”). To ensure clarity and completeness, the definitions for existing habitat, potential habitat, and non-habitat should be added to the Glossary.

We commend the BLM for its efforts to address inconsistencies in the various definitions of "lek." Additionally, we request that the BLM incorporate the definitions provided by the Western Association of Fish and Wildlife Agencies into the Glossary.

#### *State Specific Circumstances*

Mesa County extends its gratitude to the BLM and CPW for reaching a consensus on Management Zone numbering. Although this change may seem minor within each agency, it will significantly benefit those applying for permits or leases in these areas.

#### **Conclusion**

While the Bureau of Land Management has chosen to create a rangewide plan, we continue to believe in the importance of local, adaptable management to ensure public lands managed by the BLM meet the multiple use and sustained yield mandate. We look forward to continued engagement in this process and are committed to working closely with the BLM and our neighboring counties to ensure that the RMPA/EIS provides balance for the conservation needs of the Greater Sage-Grouse with the economic priorities of local communities.

Thank you for your consideration of the above comments.

Sincerely,

Bobbie Daniel, Chair

Mesa County Board of Commissioners

Cody Davis

Commissioner

Janet Rowland

Commissioner

CC: Peter Baier, Mesa County Administrator

Todd Starr, Mesa County Attorney

Mesa County Administration

---

<sup>4</sup> Bureau of Land Management. (2024). Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement, Volume 1: Executive Summary, Chapters 1—6, Glossary, and Index (p. 2-19). Retrieved May 30, 2024, from [https://eplanning.blm.gov/public\\_projects/2016719/200502020/20105921/251005921/GRSG\\_DEIS\\_Vol1\\_508.pdf](https://eplanning.blm.gov/public_projects/2016719/200502020/20105921/251005921/GRSG_DEIS_Vol1_508.pdf)