



January 18, 2017

Submitted via email: blm_co_nwdist_public_comments@blm.gov

BLM Programmatic Vegetation Treatment EA
2815 H Road
Grand Junction, CO 81506

Re: Draft Proposed Action for the Northwest Colorado Programmatic Vegetation Treatment Environmental Assessment

Dear Sir/Madam:

Western Energy Alliance appreciates the opportunity to comment on the draft proposed action for the Programmatic Vegetation Treatment Environmental Assessment (EA) for Greater Sage-Grouse (GrSG) in northwest Colorado. We support efforts to enhance habitat for the GrSG, but we have several concerns with the draft proposed action.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in Colorado and across the West. The Alliance represents independents, the majority of which are small businesses with an average of fifteen employees.

We appreciate BLM's effort to streamline the approval process for GrSG habitat restoration projects. Removing pinyon and juniper trees from the landscape will increase the amount of habitat available for the species and reduce one of the threats to the species identified by the U.S. Fish and Wildlife Service (FWS), which will in turn reduce the risk of an Endangered Species Act (ESA) listing.

Active management of GrSG habitat through specific, localized programs such as the one contemplated in this document are a far more effective tool for habitat management than the top-down, landscape-scale planning efforts enacted by BLM in September 2015. We are encouraged that BLM is taking proactive management steps, rather than simply placing restrictions on land use activities, since those restrictions rarely encourage population and habitat growth.

We do suggest, however, that BLM should coordinate with and defer to the State of Colorado, and specifically Colorado Parks and Wildlife (CPW), on habitat restoration efforts. Because the GrSG is not a listed species under the ESA, CPW maintains primacy for management of the species, and it has a number of ongoing efforts to promote habitat conservation and restoration. Coordination between BLM and CPW is especially important to ensure there is no duplication of efforts or countervailing work.

If BLM continues with this approach to habitat restoration, we assume it will utilize the Assessment, Inventory, and Monitoring (AIM) Strategy for resource management and its

Habitat Assessment Framework for evaluating habitat, although there is no reference to either in the draft proposed action. The AIM Strategy “provides high-quality information about ecosystem conditions and trends...a standard set of core quantitative indicators and methods... a defensible and statistically valid way of selecting monitoring plots that informs land management...[and] a structured implementation process built on management questions and an understanding of ecosystems.”¹ BLM should make clear in any final EA that it has a valid, defensible method for evaluating habitat.

Furthermore, we are concerned that the draft proposed action does not include a purpose and need statement explaining the full intent of BLM’s approach and analyzing the cost of this program. While we are not necessarily opposed to the treatment prescriptions in the draft proposed action, we would appreciate a discussion of how BLM arrived at these prescriptions, how they will interact with CPW management and the federal land use plan in Colorado, whether BLM will be employing the AIM Strategy, and how the program will be funded.

The purpose and need statement should also make it clear that valid existing rights held by BLM lessees will not be affected by this habitat restoration plan. The Mineral Leasing Act, Federal Land Policy and Management Act, and BLM’s own Planning Handbook all expressly limit the agency’s authority to impose mitigation measures that would exceed the terms and conditions of previously issued leases. Operators retain the right to develop their leases in accordance with the terms under which they were issued, and BLM must ensure that any proposed management would not infringe on those rights.

We believe these concerns could be easily assuaged in a purpose and need statement, so we ask BLM to re-issue a draft proposed action with this section included to allow for full public review. Thank you for the opportunity to provide feedback on the draft proposed action, and please do not hesitate to contact me with any questions.

Sincerely,



Tripp Parks
Manager of Government Affairs

¹ [AIM-Monitoring: A Component of the BLM Assessment, Inventory, and Monitoring Strategy](#), Bureau of Land Management, April 2014.