



Board of County Commissioners

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Ashley Phillips
State Office Planner
Bureau of Land Management
Colorado State Office
Denver Federal Center, Building 1A
Lakewood, CO 80215
[Via Website]

February 2, 2024

RE: Big Game Corridor Colorado Resource Management Plans Amendment - Eagle County Public Comment

Dear Ashley Phillips,

Eagle County is grateful for the opportunity to serve as a cooperating agency in the Bureau of Land Management's preparation of a statewide Resource Management Plan (RMP) Amendment with an associated Environmental Impact Statement (EIS) regarding Big Game Conservation. Nearly a quarter of all lands within Eagle County are managed by the BLM, therefore the County's strong partnership with your agency is critical to achieving the local community's goals for our natural resources, quality of life, and economy. This letter provides the County's response to the BLM's request for comments during the public review and comment period.

Alternative D, which prioritizes the avoidance of impacts to big game habitat from oil and gas development is more conservation oriented than other alternatives and it appears to more closely align with Eagle County's preferred alternative for the concurrent Oil and Gas SEIS project (Alternative F). However, Alternative D appears to offer only relatively little benefit over Alternatives B and C. By way of illustration, while Alternatives B and C offer an 8% greenhouse gas (GHG) reduction over the no-action alternative (Alternative A), Alternative D only offers a 0.3% GHG reduction beyond the other 2 action alternatives. Additionally, although Alternative D does reduce High Priority Habitat¹ (HPH) open to leasing by around 25%, it still leaves more than half (61%) of these extraordinarily important areas open to leasing, while Alternatives B and C offer a mere 0.2% reduction in HPH open to leasing from the no-action alternative, leaving a staggering 86% of HPH open to leasing. The strongest alternative, Alternative D does not seem to offer adequate protections to Colorado's invaluable wildlife resource. Therefore, Eagle County appeals to the BLM to develop and select a truly conservation oriented Alternative.

¹ High Priority Habitat (HPH) are wildlife habitat areas for which Colorado Parks and Wildlife has sound spatial data (i.e. where wildlife occur on the landscape), and science-based recommendations to avoid, minimize, and mitigate adverse impacts resulting from anthropogenic disturbance and protect breeding, nesting, foraging, migrating, or other uses by wildlife.



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A truly conservation oriented Alternative should contemplate, at minimum, a complete closure of High Priority Habitat to leasing and a reduction in greenhouse gas emissions:

- **GHG reduction.** Eagle County is already experiencing negative impacts of climate change, as was addressed in length with our scoping comments, therefore, the importance of meeting climate goals to protecting our community and to preserving big game corridors and HPH cannot be overstated. Impacts on wildlife from climate change are a variable that is not fully understood but has the potential to significantly alter streamflow dynamics and aquatic and terrestrial habitats in Eagle County (Eagle River Watershed Plan). In recent years, our community has already seen increased fire activity, wildfire smoke, debris flows, and numerous fishing closures on local rivers due to high temperatures and low streamflows. Additionally, developing and selecting an alternative with a greater reduction in GHG would be more in line with Colorado HB19-1261, Climate Action Plan to Reduce Pollution, which includes a roadmap identifying oil and gas production as one of the largest sources of GHG in the state and finds that a significant portion of targeted GHG reductions must come from the oil and gas sector.
- **Closing HPH to leasing.** The ‘no leasing alternative’ was rejected from consideration because it wasn’t considered multiple use, but there is already significant disturbance in HPH, so closing HPH to further oil and gas leasing would not constitute “exclusive use”. Additionally, multiple use does not require that every action happen on every acre. Within HPH, wildlife conservation should take precedence over other activities, including oil and gas. As part of this project, the BLM could also consider designating and protecting high value migration corridors as Wildlife Management Areas, Habitat Management Areas, Backcountry Conservation Areas, administratively protecting Lands with Wilderness Characteristics, designating new Wilderness Study Areas and/or Areas of Critical Environmental Concern.

Recreation. Recreation analysis should be incorporated throughout this project in order to meet the project’s wildlife conservation goals. Eagle County continues to experience a precipitous decline in wildlife populations, including big game species. Contributing factors include human development and recreation impacts leading to ongoing habitat loss and fragmentation and wildlife disturbance. Since the 1960s, a portion of our community has transformed from rural agricultural areas to international tourism destinations. Recreational opportunities on local, state, and federal lands have proliferated and the intensity of land use for recreation, which had been increasing steadily over time, saw a sharp increase as many embraced the outdoors during the COVID pandemic. As outlined in our scoping comments, we continue to request that the BLM incorporate recreation management considerations into this project. This could be achieved through broadening the scope of the overall project to include recreation management as a critical component of successful habitat and big game conservation, or at the very least, considering a range of anthropogenic disturbances beyond oil and gas in the project, which would include specifically addressing recreation in the cumulative impacts assessment. It is unlikely that the project can meet its goal of maintaining, conserving, and protecting big game corridors



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and other big game HPH on BLM-administered lands without incorporating recreation, which is prevalent on BLM-administered lands within Eagle County and many other jurisdictions.

Consistency with local plans. Creating and selecting a truly conservation oriented alternative would not only strengthen the range of alternatives for consideration and allow the BLM to provide adequate protections to big game species whose populations continue to decline in Eagle County, but would also provide consistency with locally adopted plans, as required by the Federal Lands Policy Management Act. Relevant policies from the Eagle County Comprehensive Plan are provided below (and were also provided at scoping). The Eagle County Comprehensive Plan is a public document, officially adopted by the County's Planning Commission, which establishes a vision and framework for the future of Eagle County. It was developed through a robust public engagement process and it reflects the vision and desires of Eagle County residents. It discusses local issues, establishes community goals, and identifies policies to achieve these goals. In addition to setting out policies and direction for the use, development, and protection of land, a comprehensive plan sets goals for the social, economic, and natural environment. Some policies from the Eagle County Comprehensive Plan that are particularly relevant to the RMP Amendment and EIS process include:

- **Wildlife Concerns**
 - 3.7.2.a. The integrity, quality, and interconnected nature of critical wildlife habitats in Eagle County should be preserved.
 - 3.7.2.b. The well-being of wildlife species of economic importance should be actively monitored and protected.
 - 3.7.2.c. The well-being of wildlife species of less economic importance and those on the rare and endangered species list should be actively monitored and protected.
- **Development Impacts**
 - 3.7.3.d. Development in areas critical to the continued well-being of Eagle County's wildlife populations should not be allowed.
 - 3.7.3 e. Where disturbances to wildlife habitats cannot be avoided, development should be required to fully mitigate potential negative impacts.
- **Habitat Protection at the Landscape Scale**
 - 3.7.4.f. Broad development patterns and the cumulative impacts of incremental development on wildlife habitats and wildlife populations should be accounted for in the decision-making process.
- **Habitat Protection at the Site Scale**
 - 3.7.5.h. Measures designed to protect wildlife from contact with human activities and disturbances should be implemented and enforced.
 - 3.7.5.i. Access to public lands and opportunities for public land recreation should be balanced with the need to preserve quality wildlife habitat.



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- River and Riparian Habitat
 - 3.6.4.h Aquatic and riparian habitats should be protected from agricultural, industrial, and development-related impacts.

This project would better align with these policies by developing and implementing a more conservation oriented alternative.

Thank you for your partnership with our community and for the opportunity to comment on the proposed project. We appreciate your attention to this matter and look forward to continuing to engage with you around this critical topic. If you have any questions regarding this letter, you may contact Maureen Mulcahy, Senior Natural Resources Planner, by email at maureen.mulcahy@eaglecounty.us or by phone at (970) 471-8830.

Sincerely,

Matt Scherr
Chair

Jeanne McQueeney
Commissioner

Kathy Chandler-Henry
Commissioner