

Meeting with the state to provide feedback on Colorado GRSG plan and Colorado Package

1. Components of the Colorado Conservation Plan (CCP) that are working well

- a. Communication among stakeholders (counties, federal and state agencies, landowners, oil and gas companies, etc.)
- b. Identification of GRSG biology, issues, and strategies in Colorado
- c. Conservation easement acquisition (over 66,000 acres since 2004)
- d. Habitat treatments to improve GRSG habitat (nearly 50,000 acres since 2001)
- e. COGCC oil and gas rules to protect GRSG (implementation of these rules is further discussed in 3.a below)

2. Questions and recommendations

- a. Oil and Gas
 - i. Probably the single most important threat to most GRSG in Colorado is oil and gas development. Colorado Oil and Gas Conservation Commission (COGCC) regulations help to protect GRSG habitat from oil and gas facility placement on non-federal lands through consultation with CPW. We support the CPW recommendations (e.g. setbacks, timing restrictions, etc.) but we are concerned that they are only being required and implemented sporadically. If they were implemented on a regular basis, then it could be considered an effective regulatory mechanism. What criteria does COGCC use when determining whether or not to accept CPW's recommendations?
 - ii. The Parachute-Piceance-Roan (PPR) population is the Colorado GRSG population most threatened by energy development. How will this population be protected from oil and gas development over the next few decades under the current COGCC rules, particularly on private lands?
- b. Livestock management
 - i. There is uncertainty regarding range condition in GRSG habitat on state and private lands. Improper grazing is identified as an important threat in the Colorado Conservation Plan and listed as a widespread threat in all GRSG populations in Colorado in the COT Report. However, no broad-scale evaluation of improper livestock management and effects on GRSG habitat has been conducted in Colorado. It is possible that improper grazing is more of a localized problem. We

need clarification on the magnitude of the threat posed by improper grazing, and if the threat is significant, how this threat is being addressed on state and private lands.

- ii. We recommend that the state finalize the Colorado Habitat Exchange program so that GRSG habitat on ranch lands can be improved/protected with the aid of mitigation dollars from energy development.

c. Exurban development

- i. To what extent do county zoning restrictions limit new development in GRSG habitat?
- ii. What county programs provide incentives for landowners to minimize development in GRSG habitat?

d. State Land Board (SLB) lands

- i. What are the primary land uses of SLB lands within the range of the GRSG and do they impact GRSG?
- ii. We need clarification on the extent of GRSG conservation actions being applied to State Land Board lands.
- iii. Are there any impediments to applying GRSG conservation measures to SLB lands?
 - 1. For example, are the COGCC oil and gas stipulations for the protection of GRSG attached to SLB leases (i.e., a 0.6 mile Restricted Surface Occupancy and a 4.0 mile Timing Limitation around leks)? These restrictions are much easier to implement if attached to a lease when sold, rather than requested at the drilling permit stage after a buyer has paid for the lease.
 - 2. Are there grazing standards for GRSG habitat protection that lessees must follow on state lands?

3. Need for better reporting and analysis to properly evaluate the effectiveness of the CCP

- a. The state should produce a synthesis report from information in the Colorado Package connecting the most important conservation actions taken, associated reduction in threat levels, and projected population trends for each GRSG population in the state. We recommend a synthesized report analyzing the following:

- i. The effects of the major conservation actions on each GRSG population since finalization of the plan, particularly on state and private lands.
- ii. Identify how the primary threats identified in the COT report, which are applicable to Colorado, have been and are being ameliorated.¹
- iii. How each GRSG population is currently doing relative to their long-term trend and carrying capacity.
- iv. Maps indicating current and future threats facing GRSG, such as:
 1. A map showing where habitat treatments have been done (visual representation of Appendix A in the Colorado Package) and where they are needed most in the future.
 2. A map showing where the threat from oil and gas development is greatest in relation to the GRSG populations in the state (e.g., overlay oil and gas high, medium, and low potential with GRSG populations and/or show where current oil and gas leases overlap with GRSG habitat).
 3. If possible, include similar maps for the other primary threats to GRSG in Colorado (e.g., exurban development, infrastructure, fire, improper grazing).

¹ The COT Report is in general agreement with the Colorado Conservation Plan that energy, improper grazing, and urbanization are all significant threats to GRSG in Colorado. Fire, infrastructure, and mining are also identified in the COT Report as rather widespread threats facing most or all Colorado GRSG populations.