



Ford County Commission  
100 Gunsmoke St.  
Dodge City, KS 67801

April 07, 2014

United States Department of Interior  
Bureau of Land Management  
Oklahoma Field Office  
7906 East 33<sup>rd</sup> Street Suite 101  
Tulsa, Oklahoma 74145

Re: Coordination with Existing Natural Resource Management Plan; EIS Scoping

Dear Mr. Tryon:

The Ford County, Kansas Board of Commissioners is in receipt of the March 14, 2014 correspondence from the Bureau of Land Management (BLM) requesting participation during revision of its Resource Management Plan (RMP) and preparation of an Environmental Impact Statement (EIS). The BLM correspondence offers our County “*Cooperating Agency*” (CA) status consistent with Council on Environmental Quality (CEQ) regulations 40 CFR §1501.6, providing a Memorandum of Understanding (MOU) for our consideration.

Our County has adopted as ordinance a Natural Resource Coordination Plan<sup>1</sup> (NRCP) that contains Resource Priorities and provides the mechanism, process and procedure for evaluating impacts to the human environment during major federal action. Because revision of the RMP is a major federal action (40 CFR 1508.18 (a)), we recognize BLM must attempt consistency with our NRCP in accordance with the Federal Land Management Policy Act 43 USC 1712 (c) and BLM Policies on Coordination<sup>2</sup>.

Having compared the existing *BLM Resource Management Plan for Kansas*<sup>3</sup> with our NRCP and a slide presentation from recent BLM Scoping Meetings, we have identified potential to impact Resource Priorities addressed by our NRCP<sup>4</sup> as well as other Conservation Plans adopted by our county.<sup>5</sup> Resources already addressed in our plans include:

- 1) Energy extraction;
- 2) Water quality and resources;
- 3) General agriculture, farming and ranching;
- 4) Maintaining multiple land-use priorities;
- 4) Livestock grazing and management;
- 5) Wildlife and threatened species;
- 6) Habitat Conservation;
- 7) Vegetation and invasive species management.

<sup>1</sup>Natural Resource Coordination Plan of Kansas Natural Resource Coalition, Revision 3. October 14, 2013.

<sup>2</sup> Bureau of Land Management. *A Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners - Meeting Coordination and Consistency Requirements*. pps 31-33

<sup>3</sup> United States Department of Interior. Resource Management Plan, Record of Decision and Plan. September, 1991

<sup>4</sup>Natural Resource Coordination Plan. pps 8-10.

<sup>5</sup>Lesser Prairie Chicken Conservation, Study and Management Plan of Kansas Natural Resource Coalition. October 14, 2013. pps7-11.

As part of the document-comparison effort we also note BLM is proposing to expand the RMP scope and consolidates plans from 3 States into one document. Similarly, it appears BLM is proposing to include "issues" not historically addressed in previous RMPs. <sup>6</sup> As Coordination with our county and the Kansas Natural Resource Coalition (KNRC) proceeds and before EIS alternatives are presented we look forward to understanding BLMs reasoning, rationale and justification for expanding the scope of the RMP process.

NEPA and FLMPA Statutes and CEQ Regulations require early notification of local government - at the beginning of the EIS Scoping process. NEPAs mandate for early inclusion of local government assures an integrated, meaningful planning process such that the unique social, cultural, socioeconomic, and human-environment values of western Kansas are considered and evaluated (40 CFR 1501.2 (a), (d) (2, 3).

Having just recently received notification of the RMP/EIS process, we observe the April 14, 2014 decision deadline imposed by BLM does not afford sufficient time for us to meet, review documents, and establish a comprehensive program for government-to-government coordination with BLM. We are also evaluating if our County or the KNRC will request Co-Lead Agency Status under 40 CFR §1506.2(c), as the 32 counties who have adopted the KNRC Coordination Plan have unique economic data, industry knowledge, agricultural records and local cultural information that must be considered during the RMP and EIS.

Because we just recently became apprised of the RMP/EIS process, we believe it necessary to participate in a Scoping Meeting. To that end, we are requesting BLM host an additional Scoping Meeting with our county and the KNRC, in Garden City, Kansas, between May and June, 2014. Our request for a Scoping Meeting should be considered a Coordination Meeting, and either our county, KNRC or both will provide information in support of the requirement for BLM to attempt consistency with resource and conservation plans we have adopted.


The 32-County KNRC was formed to support our County during Coordination with Federal and State agencies. This relationship provides for efficient interface, effective information transfer, consolidated decision support, and an information platform from which we may perform our 10<sup>th</sup> amendment responsibilities under the United States Constitution. Please copy both KNRC and our County on all information as the Coordination process on the RMP and EIS process proceeds.

The KNRC contact for this purpose is:

Ken J. Klemm  
Sherman County Commissioner  
813 Broadway,  
Goodland KS 67735  
(651) 336-9498  
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ken@thebuffaloguys.com

Cordially,

  
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Chris Boys

  
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Danny Gillum

  
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Shawn Tasset

<sup>6</sup>Development of an Environmental Impact Statement for Federal and American Indian Resource Management in Oklahoma, Texas and Kansas. Slide Presentation; "Issues to Be Addressed". November 2013 - January, 2014