Field Office Manager

Uncompahgre Field Office, BLM

Montrose, CO.

September 30, 2021

##### Re: Environmental Assessment (EA) to disclose and analyze the environmental effects of grazing on the Grizzly Gulch and Onion Valley allotments. Proposed Action and Draft Alternatives for the Grizzly Gulch/Onion Valley Grazing Permit Renewal

Thank you for the opportunity to comment on the proposed action and draft alternatives for the Grizzly Gulch grazing allotment. These comments are being submitted jointly by the Great Old Broads for Wilderness (Broads), Northern San Juan Chapter and the Black Canyon Audubon Society. Broads, as a local chapter of a national organization, operates in Delta, Montrose, Ouray, San Juan and San Miguel Counties. Our mission is to protect public lands and waters with an emphasis on preserving habitats for wildlife, sensitive species and potential refugia in the face of climate change. The Black Canyon Audubon Society, which is a local chapter of the National Audubon Society, represents 400 Audubon members in western Colorado. Our membership area covers the Crawford habitat of the Gunnison sage-grouse (GuSG) population.

We appreciate the BLM looking at grazing leases with a lens of considering land conservation and habitat quality and conservation of species listed under the Endangered Species Act, such as the threatened Gunnison sage-grouse.

There are a few issues with the proposed grazing permits that we ask BLM to clarify before completing the permit.

**Please consider grazing permits in totality**. The document *Gunnison Sage-Grouse Site-Scale Habitat Assessment Summary Report for the Crawford Area, Colorado, May 2021* presents site-scale assessment, which includes six grazing allotments, in the Crawford area. The document determined that *“sampling occurred within designated Critical Habitat (22,161 BLM acres) associated with the Crawford Area GUSG population.“* (Summary Report Sections 2.1 and 2.2). This makes the case that the six allotments are part of an area impacting the GuSG and part of the Critical Habitat for the bird. Since all six grazing allotments impact Critical Habitat for the GuSG, it would make the most sense for them to be considered together in order to consider full landscape impacts to the threatened GuSG. Please explain why the six allotments are not being considered together.

In the current BLM request for comments we are asked to review and consider the three EA documents The *Proposed Action and Draft Alternatives* document mentions the Green Mountain grazing permit on page 3 “*Around the first week of May each year an established livestock trail on the eastern edge of the Grizzly Gulch allotment would be used to trial livestock to the adjacent (north Green Mountain allotment #05017)*” and page 4 *“The allotment (Grizzly Gulch] also contains extensive boundary fences, some of which would be managed and maintained under the permit of the adjacent Green Mountain allotment and would not be listed on the Grizzly Gulch authorization.”* These two statements present that the Grizzly Gulch allotment is connected in use to the Green Mountain allotment. Please provide justification why, at a minimum, the Grizzly Gulch and Green Mountain permits are not being considered at the same time.

**Please clarify the federal agency responsible for oversight of the grazing permit.** Page One of the *Proposed Action and Draft Alternatives* states, *“…grazing in the [Grizzly Gulch] allotment is managed by the BLM by mutual agreement [with the National Park Service].”* On Page 9, it is stated *“Grizzly Gulch allotment is managed by the National Park Service by authority of MOU signed 3/1989. BLM will be* *consulted on annual grazing plans and project development.”* There is a more detailed discussion on authority in the G*rizzly Gulch & Onion Valley Allotments Land Health Assessment Amendment to the 2011 Gunnison Gorge Land Health Assessment* document, but there is no clarity on which land agency has the authority in Grizzly Gulch. It is important to know which agency will perform monitoring of the permit, ongoing land habitat assessment, enforcement of permit conditions, and institute permit changes as needed due to drought, utilization or habitat changes.

**The proposed grazing season is not adequate to protect GuSG during the nesting and brooding seasons.** We take issue with the statement on page three of the *Proposed Action* that “The Grizzly Gulch allotment would be authorized for summer or fall cattle grazing that begins after GuSG nesting dates.” The trailing of an estimated 669 cattle should not be permitted from 5/1 – 5/15 and 7/1- 7/15. Both the *Gunnison Sage-Grouse Site-Scale Habitat Assessment Summary Report for the Crawford Area, Colorado*, and the *Grizzly Gulch & Onion Valley Allotments Land Health Assessment Amendment to the 2011 Gunnison Gorge Land Health Assessment* report that nesting for GuSG takes place between March 1 and June 30 and the brood rearing time period is from July 1 through August 30. Trailing cattle during the two proposed time periods is unacceptable for protection of GuSC. Concentrated livestock activity may trample nests, lead to nest abandonment, and degrade understory cover for sage-grouse. (Gunnison Sage-Grouse Rangewide Conservation Plan. Colorado Division of Wildlife. 2005, pp 118-119). Alternate methods, other than cattle trailing, should be implemented if cattle movement is needed during the nesting and brooding time periods.

**Please provide evidence of coordination with USFWS and their authority under the ESA**. There needs to be discussion in the *Proposed Action* document about how the permit will address the GuSG Critical Habitat regulations, specifically the Primary Constituent Elements (PCEs) for the GuSG, as detailed in the *Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for Gunnison Sage-Grouse; Final Rule* (Federal Register Vol. 79, No. 224, November 20, 2014):

*Primary Constituent Element 1—*

*Extensive sagebrush landscapes capable of supporting a population of Gunnison sage-grouse. In general, this includes areas with vegetation composed primarily of sagebrush plant communities (at least 25 percent of the land is dominated by sagebrush cover within a 0.9-mi (1.5-km) radius of any given location), of sufficient size and configuration to encompass all seasonal habitats for a given population of Gunnison sage-grouse, and facilitate movements within and among populations*. (page 69333)

How does the Grizzly Gulch allotment meet that standard? According to the 2021 Land Health Assessment, the sagebrush canopy cover is below the structural guidelines for both nesting and early-brood rearing habitat and late-brood rearing habitat. (Figures 8 and 9 on pages 33-34 of the Land Health Assessment 2021).

Please explain how the grazing permits mesh with the Recovery Plan for the GuSG (USFS 2020), specifically the following Priority Actions,

*Pg22*

*“6. Improve habitat quality and quantity, and recruitment by collaborating with Federal land managers, Federal programs, and landowners to modify domestic grazing of cattle and sheep in allotments that are not meeting habitat structural guidelines…*

*8. Continue to implement road and recreational closures, road and trail decommissioning, seasonal timing restrictions, and siting of roads and trails to eliminate and minimize physical and noise disturbances to GUSG and their habitat in all populations,…”*

**Please clarify how the grazing permits will further the land health strategies that are essential for the threatened Gunnison sage-grouse.** The *Gunnison Sage-Grouse Site-Scale Habitat Assessment Summary Report for the Crawford Area, Colorado* states that,

*Based on the results of this HAV, management focus should be on the retention of sagebrush and other shrub canopy cover on all appropriate ecological sites within the range of natural variability. Management strategies should also be employed that promote increased sagebrush recruitment on appropriate ecological sites. Management strategies should also be employed that promote the retention and increase of residual herbaceous cover to help offset some of the challenges presented by low shrub cover*.

Please explain how the grazing permit will help retain sagebrush and other shrub canopy cover, promote increased sagebrush recruitment, and promote retention and increase of residual herbaceous cover.

**Please include in the 3.1.2 Design Features – Proposed Action) details on the Drought management actions that could be taken under the** **UFO Drought Monitoring Plan**. The *Proposed Action and Draft Alternatives* document on page seven refers to Appendix B, but no appendices are included. We did locate the Plan as Appendix D in the *UFO Record of Decision and Resource Management Plan, April 2020*. Based on the trends for continuing drought and the decline in sagebrush, perennial grass and forb cover, presented by BLM in the EA documents, it appears likely that drought condition trigger points will occur during the 10-year grazing permit time period. This should be stressed in the Design Features of the Grizzly Gulch grazing permit.

For consistency and clarity, the land utilization limitations stated in the Table “Drought Management after Field Verified Drought” in the *UFO Drought Monitoring Plan* should be used in place of section c. of the Terms and Conditions of the Permit.Plant stubble height and shrub utilization guidelines are a better measure than forage utilization as a percentage of the annual growing season, for the protection of land health and browse and cover protections for the GuSG. (Prescribed Grazing (528) – Habitat Improvement for Sage-grouse Conservation Practice Specifications ID-528-SGI-SPEC Natural Resources Conservation Service, Idaho December 2012 <https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_045931.pdf>)

Respectfully,

Northern San Juan Chapter Great Old Broads for Wilderness

Black Canyon Audubon Society