



July 25, 2022

Bureau of Land Management, Upper Colorado River District

Re: Colorado River Valley and Grand Junction Field Offices Supplemental Environmental Impact Statements

These comments are being submitted by the Great Old Broads for Wilderness (Broads), Northern San Juan Chapter. 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. Our chapter of over 300 supporters is volunteer-led and encompasses engaged members from Delta, Montrose, Ouray and San Miguel Counties. We are hunters and anglers, ranchers, wildlife watchers, citizen scientists, recreationists of all kinds, and business owners. Our national non-profit organization, with 40 chapters in 16 states, is dedicated to protection of wild lands and waters with a focus on preserving unfragmented habitat, enhancing biodiversity, and addressing climate change.

We appreciate the proposed Alternative E with closing of all no-known, very low/low or moderate potential for oil and gas leasing, and including the closure areas as presented in Alternative C from the proposed RMPs/Final EISs.

Gunnison (GUSG) and Greater Sage-Grouse (GRSG) Protections

We would like to see the following clarifications in the SEISs.

Maps of both sage-grouse species habitats and how they overlap onto areas listed for oil and gas open and closed areas. We understand there are GIS datafiles that allow experts to create overlay maps. However, many smaller organizations, such as the Broads, need to have viewable maps to review. The Scoping Packet maps for the *PRMP Alternative C* and *Alternative E (preliminary new)*; *Colorado River Valley Field Office, Open/Closed to Oil/Gas Leasing* should designate, and list in the legend, closures that would include GRSG habitat.

The Scoping Packet maps for the *PRMP Alternative C* and *Alternative E (preliminary new)*; *Grand Junction Field Office, Open/Closed to Oil/Gas Leasing* should designate in legend that closures cover both GUSG and GRSC critical habitat areas.

Response to the Issue “What are the impacts to affected biological, physical and heritage resources, resource uses and special designations?”

The supplemental EIS needs to include updated information, both policy and biology, on GUSG. The species was listed by FWS as Threatened under ESA on November 14, 2014. This is not reflected in the either Proposed RMP/Final EIS. It needs to be clear in the SEIS how BLM will consult and coordinate with FWS to ensure that sage-grouse habitat will be protected.

There needs to be in the SEIS a clarification that maps, etc. include more than “occupied” habitat. Critical habitat has been designated for the GUSC. [<https://data.doi.gov/dataset/final-critical-habitat-for-gunnison-sage-grouse-centrocercus-minimus>]. The FWS has maintained that they will “...consider designating unoccupied areas as critical habitat when the amount of occupied areas would not be enough to ensure conservation of the

species. For an unoccupied area to be designated as critical habitat, we must determine that there is a reasonable certainty that the area will contribute to the conservation of the species and that the area contains one or more of the physical or biological features essential to the conservation of the species.”

<https://www.fws.gov/project/critical-habitat>). Since this is the case for GUSG, the DEIS should use the wording in text and maps of “critical habitat” not solely “occupied” habitat.

The use of critical habitat for GUSC will avoid the narrow interpretation of habitat needs for GUSC. While both sage-grouse species are obligate sagebrush species, their habitat needs are broader. “During the early summer/brood-rearing season, mesic (wet) areas within or near sagebrush habitats, provide important habitats for females and chicks. Juveniles and all other life stages use mesic habitats that provide abundant forbs and invertebrates, especially once those resources are less available in nesting areas. Mesic habitats and drainages also provide cover from predators.” (*2020 Final Recovery Plan For Gunnison Sage-Grouse (Centrocercus minimus)*, page 6-7) Riparian and mesic area are also used by GRSG and should be included in closure stipulations to protect these species.

Closure areas for both GUSC and GRSG should specify no oil and gas activity within 4 miles of any identified leks. This is consistent with information from the *2020 Final Recovery Plan*. Page 21 of that plan lists on of the Priority 1 Actions: “Conserve existing habitats (Criteria 1 and 2) by improving Federal resource management plans and collaborating with State and local governments and private landowners to improve public awareness, incentives, and resources for conservation. ... Areas to prioritize for conservation and protection include occupied and suitable habitat within 4 miles (6.4 kilometers) of all leks (active, inactive, and historical) in all populations.” The *Gunnison Sage-grouse Rangewide Conservation Plan* also reports that “... breeding habitat is found within 4.0 miles of a lek. (Gunnison Sage-grouse Rangewide Conservation Plan 2005) The literature review by Manier et al. (Manier, D.J. et al. 2014. Conservation buffer distance estimates for Greater SageGrouse—A review: U.S. Geological Survey Open-File Report 2014–1239, 14 p., <http://dx.doi.org/10.3133/ofr20141239>.) supports a minimum of 4 miles as setback. The journal article by Aldridge and Boyce (Aldridge, C. L., and M. S. Boyce. 2007. Linking occurrence and fitness to persistence: a habitat-based approach for endangered greater sage-grouse. *Ecological Applications* 17:508–526) posits that 6 miles or greater is warranted for GRSG in particular.

The SEIS needs to define setbacks for both sage-grouse species due to noise from oil and gas transportation and site activity. Information on this topic is included in the *Gunnison Basin Rangewide Conservation Plan* which includes a 10 dBA above ambient noise limit on continuous noise around GUSG leks. However, intermittent noise and ambient noise levels throughout the entire range of the sage-grouse species need to also be considered. Work by Blickley, et al. shows that “chronic noise pollution can cause greater sage-grouse to avoid otherwise suitable habitat, and can cause elevated stress levels in the birds who remain in noisy areas.” (Blickley, J.L. et al. Experimental chronic noise is related to elevated fecal corticosteroid metabolites in lekking male greater Sage-Grouse (*Centrocercus urophasianus*). *PLoS One* 2012;7(11):e50462. doi: 10.1371/journal.pone.0050462. Epub 2012 Nov 20.) BLM should develop noise-based setback distances from critical habitat (GUSG) and priority habitat (GRSG), in consultation with the U.S. Fish and Wildlife Service and Colorado Parks and Wildlife.

Bighorn Sheep

Broads request that the SEIS show maps with indicate bighorn sheep range and how it may overlap with proposed oil and gas closure areas. Again, conservation groups do not always have the bandwidth and technology expertise to manipulate large data files and create multiple map overlays. Broad also asks that BLM complete an update of the information on bighorn sheep from the 2015 RMPs/EISs and include specific closure stipulations of any oil and gas leasing that contains critical wintering, lambing, and migration corridors for bighorn sheep, in consultation with Colorado Parks and Wildlife.

Botanical Species of Concern

We recommend that BLM consult closely with Colorado Native Heritage Program, Colorado Parks and Wildlife, and Colorado Native Plant Society to update the plants section while writing both SEISs. Broads did an extensive review of plants for the 2021 draft revised forest plan and draft environmental impact statement (DEIS) for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forest. Our professional botanist members found that much of the information needed to be updated as plant locations and discoveries have changed, and technology and field work has enabled better identification of species and habitat. For example, Broads identified to the Forest Service that seven important species were missing from GMUG's Species of Conservation Concern list. We recognize that, at this point, for the BLM SEISs, the plant distribution data may be seven years old and may not accurately reflect current status of botanical species. We ask that BLM conduct a thorough botanical review and include closure stipulations for oil and gas leases in the DEISs around the habitats for BLM sensitive plant species, federal and state endangered and threatened species, and CPW's Species of Greatest Conservation Need (SGCN).

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