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RE: DOI-BLM-CO-2019-0018-EA

Thank you for the opportunity to comment regarding the BLM's Programmatic Environmental Assessment for Vegetation Treatments for the Uncompahgre Field Office (UFO.) I write as the volunteer leader of the Northern San Juan chapter of Great Old Broads for Wilderness. Our chapter represents over 450 supporters across Delta, Montrose, Ouray and San Miguel Counties. As such, our supporters have a vested interest in the public lands managed by the UFO. Our members are outdoor enthusiasts, wildlife watchers, birders, botanists, former agency staff, and overall, advocates for the use of research-based best practices for managing our public lands. Several of us have received training to monitor livestock grazing and rangeland health. We appreciate your consideration of our comments.

Overall Programmatic EA:

1. We are concerned about the implementation of this programmatic EA prior to the finalization of the UFO RMP and believe it would be prudent for the BLM to wait for the updated RMP.
2. The application of this programmatic framework to the entire UFO jurisdiction - covering an expansive 900,000 acres - is problematic and we strongly recommend that the BLM undertake a closer review of landscapes targeted for treatment in order to focus the programmatic EA on acreage realistically intended for treatment.
3. Though we recognize the intention is to consider large landscape ecological health particularly for improvements to wildlife habitat and fuel reduction, the EA needs to recognize and identify acreage that is not suitable for

treatment. We appreciate that this programmatic framework excludes Wilderness Areas, Wilderness Study Areas and National Conservation Areas, and feel that exclusion should be extended to other areas worthy of protection from vegetation treatment such as Lands with Wilderness Character, riparian areas, canyons, steep landscapes, areas with sensitive/threatened species, etc. We urge BLM to use discernment in this EA and limit the acreage to landscapes suitable for treatment without negative impacts to existing healthy ecological conditions and species (including but not limited to Gunnison Sage Grouse.)

Treatment protocol:

1. We vehemently urge the BLM to employ best available science and an outcome-based approach to ensure that treatment decisions related to where, when, what type of treatment plus post-treatment monitoring maximize benefits and achievement of goals and minimize impacts to ecological integrity, wildlife habitat and corridors and sensitive areas.
2. We emphasize that any treatment reflect a likelihood of success of at least 75% based upon precipitation zone, elevation, aspect and data regarding past results reported in Appendix B. We encourage caution as data from long-term monitoring post treatment reveals that treatments often do not accomplish the desired goals and can result in increased invasive species and a reduction in native species.
3. Knowing that individual projects can sometimes have singular focused goals, we ask that the plan incorporate the need for an analysis of any proposed vegetation treatment to consider the larger landscape that surrounds the project area in order to guarantee that the project reflects multiple goals and benefits, considers natural variability across the landscape, and enhances biodiversity particularly in light of global warming. Every project must consider warming temperatures and drought conditions as part of the plan.
4. We also encourage the use of manual treatment over mechanical treatment (and strongly discourage the use of chaining/roller chopping) whenever and wherever possible as we recognize that the damage to wildlife corridors and

habit and ecological integrity and resilience by machinery (over the short and long-term) can result in more harm than the benefit of treatment.

5. Every effort must be made to minimize the introduction of and/or proliferation of invasive weeds due to habitat disturbance. Any machinery employed for treatment or vehicles used to access the area must be weed-free and precautions must be taken to limit the spread of existing invasive species (especially but not limited to cheatgrass (*Bromus tectorum*))

Access to treatment areas/Fire breaks

1. Please prioritize the use of existing, temporary and/or decommissioned roads over the creation of new roads. However, maintain a 300-foot buffer between these access routes and treatment acres to minimize the spread of invasive plant species.
2. Close, decommission and revegetate/remediate all access routes following treatment.
3. We ask that serious consideration be given to the fact that access for treatment can open project areas to recreation use. Such unauthorized use can have deleterious effects on the very wildlife and habitat the project strives to benefit. Routes opened for treatment implementation must be closed to recreation. Closures must be monitored and strictly enforced. The proliferation of user created trails in and around treatment areas is unacceptable.
4. Use existing, temporary or decommissioned roads along with topographical features and wet/snow boundaries as fire breaks for prescribed burns (rather than creating new fire lines) whenever possible to minimize disturbance to habitat and wildlife.

Post-treatment Management & Monitoring

1. Post-treatment management is crucial to the success of any vegetation treatment as highlighted in Appendix B. Best available science and researched-based monitoring practices must be utilized to evaluate the efficacy of treatment. Post-treatment monitoring is essential and cannot be optional regardless of funding and staff resources. The EA mentions monitoring “if capacity and funding persist.” If regular, diligent monitoring

is not budgeted then the treatment should not be implemented. Period – no exceptions.

2. BLM must identify who is responsible for monitoring and specify desired outcomes for each and every project plan.
3. Specifically, we want to highlight the critical need for post-treatment management regarding livestock grazing. Livestock (as well as wild game) seek out treatment areas and will undermine treatment effectiveness if grazing is not limited. Desired post-treatment conditions must be clearly described (before any prescribed treatment) and achieved prior to livestock returning to the treatment area. BLM’s own analysis in Appendix B indicates that restrictions on livestock grazing of 5-7 years may be required to achieve the desired improvement in habitat vegetation especially if establishment of shrubs is desired (and we support this targeted goal.) If it is not possible due to limited resources or agency priorities to attain these goals, then the vegetation treatment should not take place in areas that overlap grazing allotments. Too often livestock grazing after treatment negatively impacts the very conditions desired.
4. Furthermore, measurable vegetation “triggers” must be established to inform and direct ongoing management of treatment areas. Obviously, consistent monitoring is essential in order to track and report these triggers/indicators that will ultimately inform the assurance of long term land health.
5. It is a waste of taxpayer money and agency resources to implement a treatment plan and then not follow it with rigorous monitoring and management. Obviously the intended goals for wildlife benefit or fuel reduction will not be achieved if within 5-10 years (or less) the treated landscape returns to the same conditions as prior to treatment due to poor management and lack of monitoring.

Consideration of Cumulative Climate Impacts

1. In light of climate change, please address cumulative impacts of particulate and carbon dioxide releases from prescribed fires
2. Consider reduction of carbon sequestration due to loss of trees and shrubs – not project by project, but across the time and space with multiple projects planned.

Thank you again for the opportunity to comment. We appreciate your consideration of our comments.

Respectfully,
Robyn Cascade, Leader
Northern San Juan chapter