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Bureau of Land Management  
Greater Sage Grouse EIS  
2815 H Road  
Grand Junction, CO 81506

Dear Greater Sage Grouse Planning Team:

I am a retired professional biologist with 30 years experience working on fish, wildlife and rare plant conservation issues on public lands managed by the BLM and USDA Forest Service. I live in Fruita and enjoy fishing, hiking and wildlife viewing and photography on public land in the area. I am a member of Trout Unlimited, Grand Valley Anglers, and the National Audubon Society.

I was instrumental in initiating the BLM's efforts to work with Federal and state agencies to conserve sage grouse in 1999, while I was assigned to the Washington Office. I am pleased to see the BLM and Forest Service taking the initiative to develop management guidelines for the Greater sage-grouse. I appreciate the challenge of trying to reconcile competing uses and resource values on the large land base covered by this planning effort.

As you know, one of the primary reasons behind the U.S. Fish and Wildlife Service's (USFWS) determination that the Greater sage-grouse is warranted for listing as threatened or endangered is the lack of regulatory mechanisms currently in place to ensure protection for sage grouse habitat. In order for regulatory mechanisms to be considered effective for the protection of the Greater sage-grouse and its habitat, they must address the major factors contributing to the decline of sage-grouse populations and, most importantly, they must be mandatory, not optional or subject to local revision.

Major factors contributing to the decline of sage-grouse populations include:

- Loss and fragmentation of sagebrush habitat
- Degradation of habitat quality through overgrazing, increases in invasive species and woody species, and changes in wildfire timing and severity,
- Impacts from land uses including oil and gas development, roads, rights-of-way, transmission lines, fences and other infrastructure
- Disease transmission, including West Nile virus.

The BLM has a legal obligation to sustain habitat in sufficient quantities and quality for viable plant, fish and wildlife populations. Since 1995, it has the added obligation to incorporate Standards for Public Land Health in all planning and implementation decisions. Based on the information provided, it is my assessment that Alternatives A and D will not achieve these goals. Alternative B will achieve some of these goals over an extended time period, but only

if restoration budgets are provided at levels above current funding, an unlikely scenario. Among the proposed alternatives, only Alternative C fully addresses the threats identified by the USFWS and reduces resource uses that impact sage-grouse habitat to a level that will allow habitat restoration to actually achieve both Land Health and Greater sage-grouse habitat goals.

## Goals

Perhaps the most important goal for this management plan is to conserve, enhance and restore the sagebrush ecosystem upon which Greater sage-grouse populations depend in an effort to maintain or increase their abundance and distribution, in cooperation with other conservation partners.

## Current Conditions

The Draft EIS and other recent planning documents (including Grand Junction Draft RMP) describe the following concerns with current resource conditions within the planning area:

- **Greater sage-grouse** Habitat loss and fragmentation are the primary cause of their imperiled status. None of the populations are near their historic levels and most are biologically insecure. Continued threats to Greater sage-grouse include habitat loss, fragmentation, and degraded condition.
- **Sagebrush habitat condition** – within the planning area, sagebrush habitat at lower elevations (below 7000 feet) as described in the draft EIS is in generally poor condition with decadent stands lacking a herbaceous understory.
- **Livestock Grazing** – The EIS identifies 390,000 acres of public land that do not meet BLM's Land Health Standards due to livestock grazing, of the acres that have been inventoried. In the Grand Junction Draft RMP, the BLM identified concerns with land health in the majority of grazing allotments that are below 6000 feet in elevation within that planning area.
- **Fire Regime** – The draft EIS describes much of the planning area has having altered fire regimes due to 100 years of fire suppression, introduction of invasive species, and other factors. Big sagebrush species respond poorly to fire, whether prescribed or wildfire. It may take 30-50 years to restore big sagebrush communities following a burn.

## Environmental Consequences

**Alternative A (Current Management)** – According to the Draft EIS, Alternative A relies on management guidance from existing land use plans. This alternative allows all current uses and activities to continue at existing levels. Alternative A is based on continuing the current management that was considered inadequate by the USFWS in their decision that Greater sage-grouse are warranted for listing. Alternative A has continued negative impacts to sage-

grouse and sage-grouse habitat on public land. The primary threats identified by USFWS would not be alleviated.

**Alternative B** – Conservation measures in *A Report on National Greater Sage-Grouse Conservation Measures* (NTT 2011) were used to form BLM management direction under Alternative B. Conservation measures included in Alternative B focus primarily on preliminary primary habitat (PPH) and include a 3-percent disturbance cap in that habitat.

Under Alternative B:

- 1,347,400 acres would be closed to fluid mineral leasing.
- Rights of way would avoid 127,600 acres and be excluded from 930,500 acres.
- 1,702,800 acres of the planning area would remain open to livestock grazing, the same as under Alternative A.
- 1,347,400 acres would be closed to mineral material disposal.
- 945,800 acres would be open to locatable exploration or development.

Alternative B would address some of the threats to sage-grouse identified by the USFWS, primarily impacts from oil and gas development and facilities authorized through rights-of-way. It would not adequately address the on-going threats to sage-grouse habitat from livestock grazing. The draft EIS identifies more than 390,000 acres within existing grazing allotments that do not meet BLM's minimum standards for land health. These acres, as well as acres not yet inventoried that do not meet Land Health Standards, provide habitat unsuitable for sage-grouse and remain an on-going threat to sage-grouse survival.

**Alternative C (Conservation Emphasis)** – Alternative C was developed by conservation groups and individuals to emphasize protection, restoration and enhancement of all sage-grouse habitat and has the most potential beneficial effects on sage-grouse populations and habitat. It best meets the identified planning goals of the RMP. All designated habitat (ADH) would receive protection under this alternative.

- 1,702,800 acres of the planning area would be closed to livestock grazing and 0% of the area would be open to grazing. This would allow significantly more and faster vegetation improvement, including in riparian areas and grass and forb understories in brooding habitat, than under any other alternative.
- 1,702,800 acres of the planning area would have ROW's excluded. This would significantly reduce the impacts of new roads and transmission lines on sage-grouse habitat.
- 2,473,000 acres of the planning area would be closed to oil and gas leasing and 0 acres would be open to oil and gas leasing significantly reducing impacts to sage-grouse habitats compared to other alternatives.

**Alternative D (Preferred Alternative)** – Alternative D is the "adjustments alternative", which according to the Draft EIS, emphasizes balancing resource use among competing human interests, land uses, with the conservation of sage-grouse and sage-grouse habitat.

Alternative D puts a greater emphasis on continuing existing and new commodity uses. While slightly better in protecting sage grouse habitat than Alternative A, it is similar to Alternative A in deferring significant changes to existing and new human uses to some undetermined time in the future. It will have mostly continued negative effects on sage-grouse habitat, although some habitat restoration could occur if additional funds become available, an unlikely scenario under current budget forecasts. Any proposals to “restore” sagebrush habitat through the use of prescribed fire need to be carefully evaluated, particularly within big sagebrush habitat. Canopy cover is an important component of sage-grouse habitat. Big sagebrush species respond poorly to fire, taking 30-50 years to recover habitat qualities following a burn.

**Summary** – The Draft Plan makes the optimistic assumption that sufficient funds and personnel will be available to implement any alternative. This is wishful thinking, at best, since neither the BLM nor the Forest Service has received sufficient funds for conservation management in the recent past and future budget constraints make this unlikely in the future.

Neither Alternative A nor D will meet the BLM and USDA Forest Service’s legal requirement of sustaining sufficient quantity and quality of habitat for viable populations Greater sage-grouse, nor this management plan’s stated goal to conserve, enhance and restore the sagebrush ecosystem upon which Greater sage-grouse populations depend in an effort to maintain or increase their abundance and distribution.

While the measures proposed in Alternative B should result in some positive trends in grouse habitats, the changes will be incremental and are not likely to improve habitat sufficiently to recover Greater sage-grouse to viable levels during the implementation period of the RMP, due to continued negative impacts from livestock grazing, motorized vehicle use and existing oil and gas development along with restricted budgets for habitat restoration.

Alternative C is the only alternative that appears to provide sufficient habitat protection to restore habitat quality and to maintain viable populations of Greater sage-grouse through a combination of restricting resource uses that are currently having adverse effects on habitat and restoration focused on restoring previously damaged habitat. I realize that Alternative C is probably not a politically popular or feasible alternative; however, it is the only alternative among the choices provided that truly meets the BLM and Forest Service’s mandate to maintain native fish and wildlife populations at viable levels through restoring habitat quality and fully addresses the threats identified by the USFWS. By addressing threats and restoring habitat quality, the BLM and Forest Service could potentially forestall the listing of Greater sage-grouse as threatened or endangered, which would have more significant impacts to public land uses and activities.

Alternative B could be strengthened to provide more protection for sage-grouse habitat and become a more viable alternative by modifying grazing practices, particularly within PPH areas. Although BLM policy for the past 15 years has been to adjust livestock grazing levels within a year of determining that livestock grazing is a contributing factor for not meeting land health standards, 390,000 acres within the planning area and a majority of allotments below

6000 feet elevation within the Grand Junction RMP planning area continue to not meet land health standards. Whichever alternative is selected, adjustments should be made immediately to all allotments not meeting land health standards through adjustments in livestock use, road closures and restrictions on other uses that are having negative impacts. Based on current conditions and the on-going threats to the Greater sage-grouse, the BLM should consider closing all allotments within priority habitat that are not meeting land health standards if adjustments to grazing use do not result in standards being met within one year.

Thank you for the opportunity to comment on the Draft EIS.

Sincerely,



Christine Jauhola

Former BLM-WO Group Manager, Fish, Wildlife and Forests (retired)

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