

Please consider this a public comment on BLM's Colorado Sage Grouse Draft Environmental Impact Statement

Reference page number or section in RMP (optional):

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The area I'm most familiar with is the Little Snake Resource Area of Moffat County. Historically this area had some of the best greater sage grouse (GSG) populations in Colorado. My personal knowledge began in 1966 as an employee of the then Colorado Game and Fish Department. I had the opportunity to work with Glenn Rogers and Clait Braun, the two original grouse researchers. I had the opportunity to see the data and hear discussions concerning sage grouse populations during my career.

From my assessment of that information it was overuse by livestock that was the prime culprit in removing the much needed understory plant community in the sagebrush biome followed by fragmentation. Most of that area is semi-arid (<12 inches of moisture per year) and the grass community was not prepared to withstand concentrations of domestic livestock over long periods of time.

When native bunch grass community began to fail an annual grass replaced it, cheatgrass that created reoccurring fires that prevented sagebrush from reestablishing. This repeating cycle of overuse, introduction of exotic plants and fires along with the use of herbicides has seriously damaged large areas of valuable sagebrush that sage grouse depend upon for survival. In addition to losing the sagebrush the rapid cycle fires that established cheatgrass also removed most of the forbs that support early life stage sage grouse. Soft forbs provide food for young sage grouse and also support insects that young sage grouse need for protein.

Herbicide spraying that has taken place on state land board lands, BLM, and private lands is another issue. The history of the Cold Springs Mountain sage grouse population is a classic example of failure of agencies to provide protection to these birds that has been going since at least the early 1960's. The Colorado Division of Wildlife has had property on Cold Spring Mountain since at least the 1950s and biologists that worked for the agency could remember the large numbers of grouse using that area and the declines after the sagebrush removals. There were more than one sprayings and today the area is closed to hunting because the number of male sage grouse has dropped below 100, the critical number for maintaining a viable population.

Another example is the loss of a population of sage grouse from the Baker Peak state land board property starting in the late 1960s. I hunted that area in 1967 and 1968 and saw as many as 300 birds using that 12,000 acre area as a wintering ground. To my knowledge there are no grouse using that area today. A major contributor to that loss was changing use from cattle to sheep sometime in the early 1970s.

Work by Donald Hoffman, federal aid project W-37-R-32, in the 1970s and later GIS work by the Colorado Division of Wildlife showing a decrease of quality sage grouse habitat, habitat that was called class 1 in the Division of Wildlife federal aid reports. Mapping that Hoffman did in adjacent areas shows fragmentation to be a major factor in the decline of sage grouse numbers. As fragmentation increased populations decreased. Work in Wyoming, Patterson 1952, showed a

direct relationship between acres of sagebrush and grouse numbers. As acres of sagebrush declined so did sage grouse numbers.

Very little data exists before the early 1960s but reviewing the old DOW federal aid reports shows a steady decline in numbers of grouse leks and numbers of grouse from the 1960s until today.

A major problem with the BLM's draft EIS is that it provides for additional drilling in occupied habitat. This is provided for by allowing for exemptions to the general restrictions to drilling. Surface disturbance, roads, noise, general activity associated with drilling, the access this activity provides to recreational use are all compounding factors driving these birds to extinction. Most of the existing occupied habitat in Moffat County needs serious protection if sage grouse are to survive as more than museum populations.

Some of the Working Group plans suggest that removing old sagebrush to allow new plants to come in is beneficial for sage grouse. Recent work indicates that this is not true that it is older plants that contain the nutrients needed by not only sage grouse but also deer and pronghorn for winter survival.

Work by Cindy Lysne, 2004, indicated that aerial reseedling of big sagebrush is not a successful technique and is probably not successful for Wyoming sagebrush in Moffat County. The "I DO" burn is a good example of replacing sagebrush habitat that sage grouse need with a grass that sage grouse cannot use. Another grim example of failure to provide for sage grouse is the rehab work on the pipeline just east of the Little Snake State Wildlife Area. My understanding is that no attempt was done to reestablish sagebrush.

The point of the examples is to suggest that past and current research on the needs of sage grouse are well documented and being ignored. The publication "Guidelines to Manage Sage Grouse Populations and Their Habitats", Wildlife Society Bulletin vol 28, No. 4, Winter 2000 and accepted by the Western Association of Fish and Wildlife Agencies. This document contains the information necessary to protect sage grouse and their habitats and contains 132 citations that clearly indicate that enough is known about how to protect and manage this bird. In addition BLM, Forest Service, and myself have spent many days and hours in training sessions learning how to restore sagebrush habitats. This is not an issue of lack of knowledge.

The sage grouse issue is at a critical juncture. If the birds are to be saved other activities have to be limited. The Multiple Use Act did not say that every acre of BLM land should have multiple and conflicting uses to the detriment of the land. Remember, the land will be there long after the oil and gas are gone but it would nice if sage grouse were still there. Silence is not golden.