



White River and Douglas Creek Conservation Districts

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December 2, 2013

Erin Jones
Northwest Colorado Sub-Region Project Lead
BLM Greater Sage-grouse EIS
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

Re: Northwest Colorado Greater Sage Grouse Draft LUPA/EIS

Dear Ms. Jones,

The White River and Douglas Creek Conservation Districts (Districts) represent the landowners within the Districts' respective boundaries located in the Rio Blanco County which lies in Northwest Colorado. The Districts encompass a total of 1,469,700 acres of public land and 492,600 acres of private land. The Northwest Colorado Greater Sage Grouse Draft LUPA/EIS affects the majority of the land within our Districts' boundaries.

As political subdivisions of the State, the White River and Douglas Creek Conservation Districts are charged with caring for the natural resources within our boundaries. Our mission is: To provide guidance and technical assistance to encourage and promote the wise use of all the natural resources within the district by private landowners and government land management agencies. The Districts are strong proponents of the BLM's multiple use mandate.

The White River and Douglas Creek Conservation Districts (Districts) support BLM managing lands to support the Greater Sage Grouse (GSG). It is our firm belief that the GSG can and will thrive with all the multiple uses based on sound scientific range land management.

The Districts participated in BLM's Cooperating Agency process as this NW Colorado Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement (DLUPA/EIS) was drafted. Then we worked with a diverse group of stakeholders to discuss and understand the ramifications of the proposed DLUPA/EIS with the intention of making specific comments on the document.

In coordination with the diverse group of stakeholders, the Districts determined this DLUPA/EIS to be fundamentally flawed. Please refer to the comments submitted on November 27, 2013 from the stakeholder group and addressed to John Mehlhoff and Dan Jirón identifying the following fundamental flaws:

1. The document does not contain an adequate range of alternatives as required under the National Environmental Policy Act (NEPA)
2. The analysis and recommendations in the document rely heavily on the BLM National Technical Team's Report (NTT) Report, which failed to include recent scientific and commercial data and would severely limit the ability of the agencies to meet their multiple-use mandates

3. The agencies have proposed overly broad and rigid management restrictions in mapped habitat areas
4. The analysis underestimates the negative socioeconomic impact of the proposed management of GSG in the planning area
5. The disturbance cap methodology proposed in the DLUPA/EIS is not clearly defined and lacks scientific justification
6. The document does not adequately explain the proposed mitigation strategy or the context for its use.

In addition to the above submitted comments, the Districts submit the following.

Range of Alternatives: Under section 2.3.1, Develop a Reasonable Range of Alternatives, the paragraph numbered 2 states: “Blended goals, objectives, and actions from the two action alternatives to formulate a third action alternative (Alternative D) that strives for balance among competing interests and has the greatest potential to effectively address the planning issues.” This does not meet the NEPA requirement.

An example that is totally unacceptable is the four mile radius NSO from active leks in all three “action” alternatives. The same restriction listed in all three “alternatives” does not provide true alternatives. This is one issue that BLM and all stakeholders need to work together on to identify true alternatives that provide balanced and multiple uses of the public lands.

A second example is the three or five percent disturbance caps. Alternative D does provide for the larger percentage of disturbance cap. However, all three “alternatives” require the overreaching of private property rights by monitoring disturbances on the private lands. BLM does not have this authority. Local counties are the entities that have the authority to do land use planning on private lands. BLM is overreaching their authority and Counties need to reject this effort.

BLM has made it clear that the NTT Report (Alt. B) will heavily influence the management restrictions across the West. This document does not consider local conditions and assumes one size fits all. An independent review of the NTT Report verifies it does not adequately represent a comprehensive and complete review of the best scientific and commercial data available and is inappropriate for use as the primary basis of many proposed management restrictions. (*Rob Roy Ramey, Review of Data Quality Issues in a Report on National Sage-Grouse Conservation Measures Produced by the BLM NTT, Sept. 19, 2013*)

Alternative A is considered the “no action” alternative. Because the BLM utilized little input from the Cooperating Agencies and relied heavily upon the flawed NTT Report in this EIS/LUPA, it is very limited in scope. Therefore, we request that many features of Alternative A be utilized in the final decision. We specifically request many of the features from the Little Snake RMP be utilized as that RMP was developed within the past two years and it meets BLM’s multiple-use requirement as well as provides for good GRSG habitat management. See below specifics regarding Table 2.4 Range and Wild Horse sections.

Inadequate Socioeconomic Analysis: The Socioeconomic Analysis of this report relies heavily on non-market valuations and therefore underestimates the economic impact of all the action alternatives.

Mapping and 4-Mile Buffer Zone:

Implementing No Surface Occupancy (NSO) on the 4-mile buffer zone used throughout the DLUPA/EIS is unacceptable as this management restriction becomes a single species/single use tool and does not meet BLM’s multiple use mandate.

The Districts request BLM to incorporate and utilize the below terms and definitions used in the Colorado Oil and Gas Conservation Commission regulations in regards to restrictions within the 4-mile buffer around leks. (*See: Summary of CPW Mapping for Greater Sage-Grouse attached*)

- **“Sensitive Wildlife Hbitat (SWH)** – Section 306c of the COGCC rules requires that industry operators consult with CPW when they plan to develop energy in an area identified as SWH. The maps consist of

4-mile lek buffers with some areas of non-habitat “clipped,” or removed. In all cases, the required consultation includes site visits and location-specific data collection; this information will then determine which (if any) stipulations the Best Management Practices (BMP) are recommended by CPW.”

- **“Restricted Surface Occupancy (RSO)** - The area within 0.6 mile buffer around active leks is managed with RSO, and operators must avoid these areas “to the maximum extent technically and economically feasible,” (COGCC, rule 1205).”
- **“Map Updates** – Newer, finer-scale map data is being developed by CPW. These revised maps will be the focus of a COGCC rule-making in early 2014, following the 2013 map updates that were adopted for all other species. Once the new GrSG map is adopted by the COGCC, state and federal agencies will all be working from the same maps.”

SPECIFIC COMMENTS:

Comments on Tables 2-3 and 2-4 Description of Alternatives

The following comments will be in regard to Alternative D and suggestions to improve it because as stated within the EIS Alt. D is a combination of B & C. It is our opinion that Alternatives B and/or C are entirely unacceptable and D could be acceptable with the below modifications.

Range Management

P. 150 Range Management Objective.

The below quoted Range Management objective on page 150 of the DLUPA/EIS is not consistent with BLM’s multiple use mandate and requires management for a single species.

“Objective: Manage the Range Management program to 1) maintain residual herbaceous cover to reduce predation during nesting, 2) avoid GRSG habitat changes due to herbivory, 3) avoid direct effects of herbivores on GRSG, such as trampling of nests and eggs, 4) avoid altering GRSG behavior due to the presence of herbivores, 5) avoid impacts to GRSG and GRSG behavior from structures associated with grazing management, and 6) maintain and develop agreements with partners that are consistent with before-stated Range Management objectives.”

Therefore, we propose the above objective be deleted and replaced with:

“To meet BLM Standards for Public Land Health and Guidelines for Livestock Grazing Management in Colorado with special attention to Standard #4.”

Public Land Health Standard 4 states: **“Special status, threatened and endangered species (federal and state), and other plants and animals officially designated by the BLM, and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.”**

Indicators are as follows and would be clear guidance to BLM staff and interested parties regarding how to manage for any species of concern:

- All the indicators associated with the plant and animal communities standard apply.
- There are stable and increasing populations of endemic and protected species in suitable habitat.
- Suitable habitat is available for recovery of endemic and protected species.

Peer reviewed scientific studies have proven Range Best Management Practices (BMP) are not detrimental to Greater Sage Grouse (GSG) habitat and in fact can be beneficial to the GSG and other species habitat. Therefore, the Districts request the BLM reflect this information and focus on sound range management. We oppose retirement of grazing permits and grass banking.

Below are specific language edits to table 2.4. Alternative B and D are shown with the third column showing the Districts' requested language.

Range:

	<u>Alt. B</u>	<u>Alt. D</u>	<u>Requested Language</u>
19	(PPH) Within GRSG PPH, incorporate GRSG habitat objectives and management considerations into all BLM and USFS grazing allotments through Allotment Management Plans or permit renewals and/or USFS Annual Operating Instructions.	(ADH) Same as Alternative B, except apply to ADH.	<p>From Alt. A: Identify and initiate restoration and rehabilitation of sagebrush habitat while maintaining a mosaic of canopy cover and seral stages.</p> <p>Special status, threatened and endangered species, and other plants and animals officially designated by the BLM and their habitats are maintained and enhanced by sustaining healthy, native plant and animal communities</p> <p>Guidelines for Livestock Grazing Management A-3, #7, "Natural occurrences...should be combined with livestock management practices to move toward the sustainability of biological diversity across the landscape, including the maintenance, restoration, or enhancement of habitat to promote and assist recovery and conservation of threatened, endangered, or other special status species by helping provide natural vegetation patterns, a mosaic of successional stages, and vegetation corridors this minimizing habitat fragmentation."</p>
20	(ADH) Work cooperatively on integrated ranch planning within GRSG habitat so operations with deeded/BLM and/or USFS allotments can be planned as single units.	<p>Same as Alternative B.</p> <p>Comment: The Districts encourage landowners to integrate conservation planning on private and public lands and to work cooperatively with surrounding landowners including public land managers. However, we <u>do not</u> support the Federal Agencies involvement in private land</p>	<p>From Alt. A: Sustain the integrity of the sagebrush biome to maintain viable populations of GRSG...consistent with local conservation plans.</p> <p>Identify and initiate restoration and rehabilitation of sagebrush habitat while maintaining a mosaic of canopy cover and seral stages.</p>

		management and can not support this as a requirement of the grazing permit.	
21	(PPH) Prioritize completion of land health assessments (USFS may use other analyses) and processing grazing permits within GRSG PPH areas. Focus this process on allotments that have the best opportunities for conserving, enhancing or restoring habitat for GRSG. Utilize BLM Ecological Site Descriptions (USFS may use other methods) to conduct land health assessments to determine if standards of range-land health are being met.	(ADH) Same as Alternative B, but apply to ADH. Consider GRSG habitat requirements in conjunction with all resource values managed by the BLM, and give preference to GRSG habitat unless site-specific circumstances warrant an exemption. Support Alt. D with the exception of the above stricken language. This last portion of the sentence errors towards single species management which is not good range or ecological management.	From Alt. A: Establish desired plant communities, in coordination with stakeholders across the local field office, in a way that focuses on native communities and intact ecosystems while allowing nonnative species, where appropriate, on a case-by-case basis.
22	(ADH) Conduct land health assessments that include (at a minimum) indicators and measurements of structure/condition/composition of vegetation specific to achieving GRSG habitat objectives (Doherty et al. 2011). If local/state seasonal habitat objectives are not available, use GRSG habitat recommendations from Connelly et al. 2000a and Hagen et al. 2007.	Same as Alternative B. Support utilizing local data. Oppose utilizing non-local data.	From Alt. A: Overall habitat goals for the sagebrush biome and GRSG established.
--	No similar action.	No similar action.	

Implementing Management Actions after Land Health and Habitat Evaluations

23	(PPH) Develop specific objectives to conserve, enhance or restore PPH based on BLM Ecological Site Descriptions (USFS may use other methods) and assessments	(ADH) Develop specific objectives through NEPA analysis conducted in accordance with the permit/lease renewal process to conserve,	From Alt. A: <ul style="list-style-type: none"> • Manage for a diversity of seral stages within plant communities. • Restore natural disturbance regimes, such as fire, and vegetation treatments to accomplish biodiversity objectives. • Establish desired plant communities in
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<p>(including within wetlands and riparian areas). If an effective grazing system that meets GRSG habitat requirements is not already in place, analyze at least one alternative that conserves, restores or enhances GRSG habitat in the NEPA document prepared for the permit renewal (Doherty et al. 2011b; Williams et al. 2011).</p> <p>Oppose – utilize Alt D</p>	<p>enhance, or restore GRSG habitat. Base benchmarks on Ecological Site/Range Site Descriptions. When existing on Ecological Site/Range Site Descriptions have not been developed, or are too general to serve adequately as benchmarks, identify and document local reference sites for areas of similar potential that exemplify achievement of GRSG habitat objectives and use these sites as the benchmark reference.</p> <p>Establish measurable objectives related to GRSG habitat from baseline monitoring data, ecological site descriptions, or land health assessments/evaluations.</p> <p>Support with struck out language</p>	<p>coordination with stakeholders across the LSFO.</p> <ul style="list-style-type: none"> • Restore a diversity of seral stages within sagebrush communities. • Maintain large patches of high-quality sagebrush habitats, consistent with the natural range of variability for sagebrush communities in northwest Colorado.
<p>24</p> <p>(ADH) Manage for vegetation composition and structure consistent with ecological site potential and within the reference state to achieve GRSG seasonal habitat objectives.</p> <p>Oppose – utilize Alt D</p>	<p>(ADH) Manage for vegetation composition and structure consistent with ecological site potential and within the reference state subject to successional stage objectives as defined by the Natural Resources Conservation Service (NRCS).</p> <p>Support with added language.</p>	<p>Clarify that BLM will utilize Natural Resource Conservation Service’s Range Conditions to define ‘successional stage objectives.’</p> <p>From Alt. A: Manage for a diversity of seral stages within plant communities.</p>

25	<p>(ADH) Implement management actions (grazing decisions, Annual Operating Instructions [USFS only], Allotment Management Plan/Conservation Plan development, or other agreements) to modify grazing management to meet seasonal GRSG habitat requirements (Connelly et al. 2011). Consider singly, or in combination, changes in:</p> <ol style="list-style-type: none"> 1. Season or timing of use; 2. Numbers of livestock (include use or livestock removal); 3. Distribution of livestock use; 4. Intensity of use; and 5. Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats) (Briske et al. 2011). <p>Oppose</p>	<p>(ADH) Include terms and conditions on grazing permits and leases that assure plant growth requirements are met and residual forage remains available for GRSG hiding cover. Specify as necessary:</p> <ol style="list-style-type: none"> 1. Season or timing of use; 2. Numbers of livestock (include temporary non-use or livestock removal); 3. Distributions of livestock use; 4. Intensity of use (utilization or stubble height objectives); 5. Kind of livestock (e.g., cattle, sheep, horse, llama, alpaca, and goat); 6. Class of livestock (e.g., yearlings versus cow/calf pairs). <p>See suggested language.</p>	<p>From Alt. A: Manage for a diversity of seral stages within plant communities. Restore natural disturbance regimes, such as fire, and vegetation treatments to accomplish biodiversity objectives. Establish desired plant communities in coordination with stakeholders across the Local Field Office. Restore a diversity of seral stages within sagebrush communities.</p> <p>Maintain large patches of high-quality sagebrush habitats, consistent with the natural range of variability for sagebrush communities in northwest Colorado.</p> <p>Note: Residual forage requirements seem to be ever-changing based on new science. Clarify what “plant growth requirements” will be the standard, and how the EIS will assure that outdated forage requirements will be updated without an EIS plan amendment.</p>
26	<p>(PPH) During drought periods, prioritize evaluating effects of the drought in GRSG PPH areas relative to their needs for food and cover. Since there is a lag in vegetation recovery following drought (Thurow and Taylor 1999), ensure that post-drought management allows for vegetation recovery that meets GRSG needs in GRSG PPH areas.</p>	<p>(ADH) Develop drought contingency plans at the appropriate landscape unit that provide for a consistent/appropriate BLM/USFS response. Plans should establish policy for addressing ongoing drought and post-drought recovery for GRSG habitat objectives and all other uses.</p>	<p>No similar action in Alt. A</p> <p>Note: wildlife forage demand should be calculated in drought planning, and although not the BLM’s responsibility, we support reducing wildlife numbers to the same degree that livestock must be reduced to avoid misuse of the rangeland.</p>

	Oppose	Support with added language	
Riparian Areas and Wet Meadows			
27	(PPH) Manage riparian areas and wet meadows for proper functioning condition or other similar methodology (USFS only) within GRSG PPH.	Same as Alternative B, but apply to ADH and utilize NRCS guidelines for riparian and wet meadows. Support with added language.	From Alt. A: Riparian systems... function properly. Riparian vegetation captures sediment and provides forage, habitat, and biodiversity. Special status... species... and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.
28	(ADH PPH) Manage wet meadows to maintain a component of perennial forbs with diverse species richness relative to site potential (i.e., reference state) to facilitate brood rearing. Also conserve or enhance these wet meadow complexes to maintain or increase amount of edge and cover within that edge to minimize elevated mortality during the late brood rearing period (Hagen et al. 2007; Kolada et al. 2009; Atamian et al. 2010). Oppose a requirement of a specific stubble height such as 6".	(ADH) Within ADH, manage wet meadows to maintain diverse species richness, including a component of perennial forbs, relative to site potential (i.e., reference state). Support	From Alt. A: Riparian systems... function properly. Riparian vegetation captures sediment and provides forage, habitat, and biodiversity. Special status... species... and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.
29	(ADH) Where riparian areas and wet meadows meet proper functioning condition or meet standards using other similar methodology (USFS only), strive to attain reference state vegetation relative to the ecological site description. For example: Within GRSG PPH, reduce hot season grazing on riparian and meadow complexes to	(ADH) Establish permit/lease terms and conditions (Line 19) in conjunction with grazing strategies to ensure that the timing and level of utilization results in wet meadows with diverse species richness, including a component of perennial forbs, relative to site	From Alt. A: Manage riparian habitat in compliance with the Land Health Standard 2: Riparian systems associated with both running and standing water function properly and have the ability to recover from major disturbances such as fire, severe grazing, or 100-year floods. Riparian vegetation captures sediment and provides forage habitat and biodiversity. Water quality is improved or maintained. Stable soils store and release water.

	<p>promote recovery or maintenance of appropriate vegetation and water quality. Utilize fencing/herding techniques or seasonal use or livestock distribution changes to reduce pressure on riparian or wet meadow vegetation used by GRSG in the hot season (summer) (Aldridge and Brigham 2002; Crawford et al. 2004; Hagen et al. 2007). Oppose, support Alt D.</p>	<p>potential (i.e., reference state).</p> <p>See suggested language</p>	
30	<p>(PPH) Authorize new water development for diversion from spring or seep source only when GRSG PPH would benefit from the development. This includes developing new water sources for livestock as part of an Allotment Management Plan/Conservation Plan to improve GRSG habitat.</p> <p>Oppose Support Alt D.</p>	<p>(ADH) Authorize new water development only after determining that the project will not adversely impact GRSG from habitat loss. Ensure that adequate long-term grazing management is in effect before authorizing water developments that may increase levels of use or change season of use. Give specific consideration to adjacent or downstream wetland habitat when a project entails a diversion from a spring or seep.</p> <p>Support</p>	<p>Allow GRSG habitat mitigation efforts if it is determined that there is a definite need for the specific water development for other uses of the public lands.</p>
31	<p>(PPH) Analyze springs, seeps and associated pipelines to determine if modifications are necessary to maintain the continuity of the predevelopment riparian area within GRSG PPH. Make modifications where necessary, considering impacts to other water uses when such considerations are neutral or beneficial to GRSG.</p>	<p>(ADH) Analyze springs, seeps and associated water developments to determine if modifications are necessary to maintain the continuity of the predevelopment riparian area within GRSG habitats. Make modifications where necessary, including dismantling water</p>	<p>(PPH) When considering a water development, analyze springs, seeps and associated pipelines to determine if modified plans are necessary to maintain the continuity of the predevelopment riparian area.</p> <p>Also analyze the benefits the water development may offer by reducing pressure from large numbers of ungulates around limited water facilities. Weigh these benefits with any possible negative effects of the water development before making decision regarding implementation.</p> <p>If GRSG populations are on a downward trend</p>

	Oppose	developments. Oppose Note: BLM cannot decommission approved projects that hold valid existing rights, such as water rights or road access rights.	due to scientifically verified habitat loss, require mitigation measures to improve applicable or nearby wetland habitat.
--	No similar action.	No similar action.	

Treatments to Increase Forage for Livestock/Wild Ungulates

32	<p>(PPH) Only allow treatments that conserve, enhance or restore GRSG habitat (this includes treatments that benefit livestock as part of an Allotment Management Plan/Conservation Plan to improve GRSG habitat).</p> <p>Oppose</p>	<p>(PPH–Sagebrush Ecosites) Retain in sagebrush habitat, for each Colorado MZ, a minimum of 70 percent of the ecological sites capable of supporting 12 10 percent canopy cover of Wyoming Sagebrush or 15 10 percent canopy cover of Mountain Sagebrush. Manage for a total disturbance cap of less than 30 percent, to include all loss of sagebrush from all causes including anthropogenic disturbance, wildfire, plowed field agriculture, and vegetation treatments. This cap is applied to PPH that supports sagebrush ecosites in the Colorado MZ. Sites capable of supporting sagebrush habitat will count against the cap until they have recovered to at least 12 percent canopy cover in Wyoming big sagebrush and 15 percent in mountain big sagebrush dominated areas (Bohne et al. 2007). Note:</p> <ul style="list-style-type: none"> • Only mappable stands of cheatgrass and Pinyon/Juniper encroachment will count against the disturbance cap. • Irrigated meadows do not count against the cap. • On a site by site basis, independent of cap management issues, do not allow treatments with the potential to adversely affect 	<p>From Alt. A: Manage for a diversity of seral stages within plant communities. Restore natural disturbance regimes, such as fire, and vegetation treatments to accomplish biodiversity objectives. Establish desired plant communities in coordination with stakeholders across the Local Field Office. Restore a diversity of seral stages within sagebrush communities.</p> <p>Maintain large patches of high-quality sagebrush habitats, consistent with the natural range of variability for sagebrush communities in northwest Colorado.</p> <p>Note: Residual forage requirements seem to be ever-changing based on new science. Clarify what “plant growth requirements” will be the standard, and how the EIS will assure that outdated forage requirements will be updated without an EIS plan amendment.</p> <p>We oppose the 12% and 15% canopy cover requirement.</p> <p>We request you review Moffat County research that indicates GRSG prefer 10% sagebrush canopy. If there is research that indicates GRSG prefers greater percent in other locations, it reiterates the need to allow management flexibility at local</p>
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	<p>GRSG populations.</p> <p>Consider the negative impacts of vast acres of overgrown sagebrush where there is no other vegetation. Do the GRSG utilize these sagebrush monocultures or should they be altered to begin new sagebrush growth and other plant species that will benefit the GRSG and other species?</p>	<p>levels rather than one size fits all.</p> <p>Requiring 12% and 15% canopy cover with the knowledge that the percentage will only increase over time and that GRSG prefer a less percentage of cover is contradicting your stated purpose to provide the best habitat for GRSG.</p>
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33	<p>(PPH) Evaluate the role of existing seedings that are currently composed of primarily introduced perennial grasses in and adjacent to GRSG PPH to determine if they should be restored to sagebrush or habitat of higher quality for GRSG. If these seedings are part of an Allotment Management Plan/ Conservation Plan or if they provide value in conserving or enhancing the rest of the PPH, then no restoration would be necessary. Assess the compatibility of these seedings for GRSG habitat or as a component of a grazing system during the land health assessments (or other analyses [USFS only]) (Davies et al. 2011). For example: Some introduced grass seedings are an integral part of a livestock management plan and reduce grazing pressure in important sagebrush habitats or serve as a strategic fuels management area.</p>	<p>Same as Alternative B.</p> <p>Support</p>	<p>From Alt. A:</p> <ul style="list-style-type: none"> • Preserve and protect special status species. • Sustain the integrity of the sagebrush biome to maintain viable populations of GRSG. • Identify and initiate restoration and rehabilitation of sagebrush habitat.
--	No similar action.	No similar action.	

Structural Range Improvements and Livestock Management Tools

34	<p>(PPH) Design any new structural range improvements and location of supplements (salt or protein blocks) to conserve, enhance, or restore GRSG habitat through an improved grazing management system relative to GRSG objectives. Structural range improvements, in this context, include but are not</p>	<p>(ADH) In coordination with permittee, Design new range improvement projects to enhance livestock distribution and to control the timing and intensity of utilization. Examples of structural range improvement projects are cattle guards, fences, corrals, pipelines, troughs, storage tanks, windmills, ponds/reservoirs, solar panels, and spring developments. Include a plan to monitor and control invasive plant species</p>	<p>Note: Permittee must be involved in planning decisions because he/she is the one who knows and understands the habits of the livestock. Therefore, the permittee will have a better understanding of the value of proposal.</p>
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	<p>limited to: cattle guards, fences, exclosures, corrals or other livestock handling structures; pipelines, troughs, storage tanks (including moveable tanks used in livestock water hauling), windmills, ponds/reservoirs, solar panels and spring developments. Potential for invasive species establishment or increase following construction must be considered in the project planning process and monitored and treated post-construction.</p> <p>Oppose</p>	<p>following any related ground disturbance. Place mineral or salt supplements away from water sources and leks in locations that enhance livestock distribution.</p> <p>Support</p>	
35	<p>(PPH) When developing or modifying water developments, use applicable PDFs or RDFs (see this table's PDFs/RDFs) to mitigate potential impacts from West Nile virus (Clark et al. 2006; Doherty 2007; Walker et al. 2007b; Walker and Naugle 2011).</p> <p>Oppose - not all water developments create potential for West Nile impacts.</p>	<p>(PPH) Where conditions create the potential for impacts from West Nile virus, use PDFs/RDFs to mitigate the potential impacts. See this table's PDFs/RDFs.</p> <p>Support</p>	<p>Mosquitos found above a certain location do not carry West Nile. Therefore, this should not be an issue above that elevation.</p> <p>One size does not fit all.</p>
36	<p>(PPH) Evaluate existing structural range improvements and location of supplements (salt or protein blocks) to make sure they conserve, enhance or restore GRSG habitat.</p> <p>Oppose</p>	<p>(PPH) Evaluate existing structural range improvements to determine if they are in fact negatively impacting GRSG. modifications are necessary to maintain GRSG populations or reverse a downward population trend caused by habitat loss. Modify, mitigate, or decommission projects as necessary in coordination with developing alternatives that will provide the intended benefit to other species as necessary. Place mineral and salt supplements away from water sources and leks in locations that enhance livestock</p>	<p>From Alt. A: Preserve and protect special status species.</p> <p>Identify and initiate restoration and rehabilitation of sagebrush habitat while maintaining a mosaic of canopy cover and seral stages.</p> <p>Special status, threatened and endangered species, and other plants and animals officially designated by the BLM and their habitats are maintained and enhanced by sustaining healthy, native plant and animal</p>

		distribution. See suggested language.	communities. Natural occurrences...should be combined with livestock management practices to move toward the sustainability of biological diversity across the landscape, including the maintenance, restoration, or enhancement of habitat to promote and assist recovery and conservation of threatened, endangered, or other special status species by helping provide natural vegetation patterns, a mosaic of successional stages, and vegetation corridors thus minimizing habitat fragmentation.
37	(PPH) To reduce outright GRSG strikes and mortality, remove, modify or mark fences in high risk areas within GRSG PPH based on proximity to lek, lek size, and topography (Christiansen 2009; Stevens 2011). Oppose	(ADH) Mark fences in high risk areas (Christiansen 2009; Stevens 2011). (PPH) Where marking fences does not reduce fence-related GRSG mortality, consider modifying fences. Where modification does not reduce GRSG mortality and the fence-related mortality is sufficient documented to adversely affect GRSG populations, evaluate remove fences removal options and the effects of the alternative options required to provide the original need of the fence. Support with edits.	
--	No similar action.	No similar action.	

Retirement of Grazing Privileges

39	(ADH) Maintain retirement of grazing privileges as an option in priority GRSG areas when the current permittee is willing to retire grazing on all or part of an allotment. Analyze the adverse impacts of no livestock use on wildfire and invasive species threats (Crawford et al. 2004) in evaluating	(ADH) When a permittee or lessee voluntarily relinquishes grazing preference, consider conversion of the allotment to a reserve allotment (grass bank) that will remain available for use on a temporary, nonrenewable basis for the benefit of GRSG habitat. Authorize temporary nonrenewal permits in reserve allotments to meet resource objectives elsewhere such as rest, or	Oppose all grazing allotment retirements and grass banking as proposed. Best management grazing practices are beneficial to the range and ecosystem which in turn is a benefit to the GRSG.
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	retirement proposals. <i>Planning direction note:</i> Each planning effort will identify the specific allotment(s) where retirement of grazing privileges is potentially beneficial. Oppose	deferment due to fire. Oppose	
--	No similar action.	No similar action.	Oppose all grazing allotment retirements and grass banking as proposed. Best management grazing practices are beneficial to the range and ecosystem which in turn is a benefit to the GRSG.

Wild Horse Management:

The Districts support Alternative D in regards to wild horse management because it describes the need to manage for both horses and GRSG. In fact, this is a prime example of the value of public lands multiple-use for all species, interests, and uses. The public lands cannot be managed for horses alone, grouse alone, any wildlife species alone, livestock alone, extraction industry alone, etc. Scientifically sound, best management practices (range, extraction, reclamation, etc.) implemented on the public lands will provide the most diverse ecosystem while wisely using all the natural resources and keeping healthy local, state, and national economies.

The White River and Douglas Creek Conservation Districts appreciate the opportunity to comment on the Draft Land Use Plan Amendment and Environmental Impact Statement (EIS) regarding Northwest Colorado Greater Sage Grouse. If you have any questions about the above comments please contact our Executive Director, Callie Hendrickson, at 970-250-6825 or callie.districts@gmail.com or either of the undersigned District Presidents at the number listed below signatures.

Sincerely,



Leonard Thompson, President
White River Conservation District
(970) 878-5257



Scott Robertson, President
Douglas Creek Conservation District
(970) 261-1451