Scoping Report

Gunnison Sage-Grouse Range-Wide Resource Management Plan Amendment/EIS

Prepared for:

BLM Colorado
2850 Youngfield Street
Lakewood, Colorado 80215

October 28, 2014

Ecosphere Environmental Services

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Cortez, CO
Pagosa Springs, CO
Santa Fe, NM
Farmington, NM

United States Department of the Interior

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In Reply Refer to:
1610 (CO910)

NOV 21 2014

Dear Reader:

The Bureau of Land Management (BLM) is in the process of formulating an effective landscape-level strategy for managing Gunnison Sage-Grouse habitat on BLM-administered public lands across the range of the species. This effort was initiated in response to a January 2013 proposal by the U.S. Fish and Wildlife Service to 1) list the Gunnison Sage-Grouse *(Centrocercus minimus)* as endangered, and 2) designate critical habitat for the species in accordance with the Endangered Species Act.

The resulting plan amendment and associated environmental impact statement (EIS) could replace direction in up to eleven resource management plans (RMP) for BLM units with Gunnison Sage-Grouse habitat in southwest Colorado and southeast Utah, including:

Colorado

- Canyons of the Ancients National Monument RMP (2010)
- Grand Junction RMP (1987) (currently under revision in the Grand Junction RMP and the Dominguez-Escalante RMP)
- Gunnison RMP (1993)
- Gunnison Gorge NCA RMP (2004)
- San Juan/San Miguel RMP (1985) (currently under revision in the Tres Rios and Uncompahgre RMPs)
- San Luis RMP (1991)
- Uncompahgre Basin RMP (1989) (currently under revision in the Dominguez-Escalante National Conservation Area RMP and Uncompahgre RMP)

Utah

- Moab RMP (2008)
- Monticello RMP (2008)

The National Environmental Policy Act of 1969 and the Federal Land Policy and Management Act of 1976 help guide the BLM in the evaluation of management decisions and practices.

Together these acts provide a framework for the BLM to engage and solicit public input concerning land management issues. The first phase of public involvement, known as ***scoping***, helps the BLM to establish a range of issues to be addressed in the draft RMP amendment and EIS.

On July 18, 2014, the BLM initiated public scoping and tribal consultation for the RMP amendment. In August, the BLM conducted four public meetings across the range of the species and provided multiple avenues for the public to submit written input regarding the planning effort. From the meetings and feedback, the RMP amendment team compiled a range of substantive issues and concerns of greatest significance to the public.

The attached *Scoping Report for the Gunnison Sage-Grouse Range-Wide Plan Amendment/EIS* contains a summary of the comments received during this process, as well as details regarding the nature of the input received.

Sincerely,

Ruth Welch
State Director, BLM Colorado

TABLE OF CONTENTS

List of Tables II
List of Figures III
ACRONYMS AND ABBREVIATIONS IV
1. INTRODUCTION 1
1.1 Background 1
1.2 Purpose and Need for the RMP Amendment and EIS 3
1.3 Description of the Planning Area 4
1.4 Overview of the Scoping Process 5
1.5 Description of the Scoping Process 6
1.5.1 Notice of Intent 6
1.5.2 Project Website 6
1.5.3 Postcard and Mailing List 7
1.5.4 Press Release 7
1.5.5 Public Scoping Meetings 8
1.6 Resource Advisory Councils 9
1.7 Cooperating Agencies 9
1.8 Tribal Consultation and Coordination 10
2. ISSUE SUMMARY 12
2.1 Summary of Public Comments 12
2.1.1 Commenters by Affiliation 13
2.2 Issues Identified During Scoping 13
2.2.1 Comments by Planning or Resource Issue Category 13
2.2.2 Issues that will not be addressed in the RMP Amendment and EIS 21
2.3 Anticipated Decisions 22
2.4 Valid Existing Management to Be Carried Forward 23
2.4.1 Future Land Use Plan-Level Decisions 23
2.5 Special Designations, including Nominations 24
3. PRELIMINARY PLANNING CRITERIA 25
4. DATA SUMMARY/DATA GAPS 27
5. SUMMARY OF FUTURE STEPS IN THE PLANNING PROCESS 28
5.1 Public Involvement Opportunities 29

APPENDICES 30
Appendix A – Map of Planning Area 31
Appendix B – Federal Register Notice of Intent 33
Appendix C – Scoping Postcard and Mailing List 37
Appendix D – Press Release 46
Appendix E – Scoping Maps 50
Appendix F – Scoping Displays 61
Appendix G – Scoping PowerPoint 70
Appendix H – Scoping Handouts 92
Appendix I – Scoping Meeting Records 101
Appendix J – Cooperating Agency Letter 113
Appendix K – Tribal Consultation Letter 116
Appendix L – Alphabetical List of Commenters 119
Appendix M – Comments Organized by Resource Category 123

List of Tables

Table 1 - Number of Commenters by Affiliation 13
Table 2 - Number of Comments by Resource or Planning Issue 14
Table 3 - Number of Comments by BLM Response Type 22
Table 4 - Comments pertaining to Data and Best Available Science 124
Table 5 - Comments pertaining to Drought Management and Climate Change 136
Table 6 - Comments pertaining to Energy and Mineral Development 138
Table 7 - Comments pertaining to Fish and Wildlife 148
Table 8 - Comments pertaining to Livestock and Grazing 156
Table 9 - Comments pertaining to Invasive Species 168
Table 10 - Comments pertaining to Lands and Realty/ROWs 169
Table 11 - Comments pertaining to Partnerships and Collaboration 175
Table 12 - Comments pertaining to Planning and the Planning Process 182
Table 13 - Comments pertaining to Recreation and Travel Management 202
Table 14 - Comments pertaining to Social, Economic, and Environmental Justice 209
Table 15 - Comments pertaining to Special Management Areas 214
Table 16 - Comments pertaining to Vegetation Management 220

Table 17 - Comments pertaining to Water, Soil, and Riparian Areas 222

List of Figures

Figure 1 - Map of Planning Area 32
Figure 2 - Map of Draft Gunnison Sage-Grouse Range 51
Figure 3 - Map of BLM Grazing Allotments within GUSG Range 52
Figure 4 - Map of Oil, Gas and Geothermal Leases within GUSG Range 53
Figure 5 - Map of BLM Roads and Trails within GUSG Range 54
Figure 6 - Map of Federal Surface and Subsurface, Cimarron/Cerro/Sims Mesa Population 55
Figure 7 - Map of Federal Surface and Subsurface, Crawford Population 56
Figure 8 - Map of Federal Surface and Subsurface, Gunnison Population 57
Figure 9 - Map of Federal Surface and Subsurface, Monticello/Dove Creek Population 58
Figure 10 - Map of Federal Surface and Subsurface, Piñon Mesa Population 59
Figure 11 - Map of Federal Surface and Subsurface, Poncha Pass Population 60
Figure 12 - Poster of BLM Role in GUSG and GUSG Habitat Conservation 62
Figure 13 - Poster of Counties and BLM Field Offices with GUSG or GUSG Habitat 63
Figure 14 - Poster of Ways to Provide GUSG Scoping Comments 64
Figure 15 - Poster of GUSG Scoping Meeting Format 65
Figure 16 - Poster of Public Participation Opportunities 66
Figure 17 - Welcome Poster 67
Figure 18 - Why This? Why Now? Poster 68
Figure 19 - Tri-fold Display with Project Background Information 69
Figure 20 - Handout of Frequently Asked Questions Regarding the Plan Amendment/EIS 93
Figure 21 - Handout of Frequently Asked Questions Regarding Public Scoping 96
Figure 22 - Handout providing information on How to Comment 98
Figure 23 - Scoping Comment Form 99

ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
BLM	U.S. Department of Interior Bureau of Land Management
CCA	Gunnison Basin Candidate Conservation Agreement
CCAA	Candidate Conservation Agreements with Assurances
CFR	Code of Federal Regulations
CPW	Colorado Parks and Wildlife
ESA	Endangered Species Act
EIS	Environmental Impact Statement
FWS	U.S. Fish and Wildlife Service
GUSG	Gunnison Sage-Grouse
IM	Instruction Memorandum
NEPA	National Environmental Policy Act
NOI	Notice of Intent
RAC	Resource Advisory Council
RCP	Rangewide Conservation Plan
RMP	Resource Management Plan
USFS	U.S. Forest Service
WSA	Wilderness Study Area

1. INTRODUCTION

The U.S. Department of Interior Bureau of Land Management (BLM) is preparing a range-wide resource management plan amendment (RMP Amendment) and associated Environmental Impact Statement (EIS) to incorporate consistent objectives and conservation measures into applicable RMPs intended to better protect Gunnison Sage-Grouse (GUSG) habitat and support stable GUSG populations. The proposed RMP Amendment would identify and incorporate appropriate regulatory mechanisms to conserve, enhance, and restore GUSG habitat. BLM Colorado is leading the effort on behalf of BLM Colorado and Utah.

As required under the National Environmental Policy Act (NEPA), the BLM conducted public outreach (known as scoping) for the EIS from July 18 through August 22, 2014. This report summarizes the scoping activities conducted and results of the outreach efforts.

1.1 BACKGROUND

The GUSG is a large-bodied, primarily ground-feeding bird species found south of the Colorado River in southwest Colorado and southeast Utah. In 2000, the GUSG *(Centrocercus minimus)* was officially recognized by the American Ornithological Union as a distinct species from the Greater Sage-Grouse *(Centrocercus urophasianus)*. Approximately 5,000 breeding GUSG occur among seven separate populations in southwest Colorado and southeast Utah.

The GUSG requires a variety of habitats, including large expanses of sagebrush with a diversity of grasses and forbs and healthy wetland and riparian ecosystems. The birds also require sagebrush for cover, as well as for fall and winter food. GUSG populations have been adversely affected by loss, degradation, and fragmentation of habitat due to residential and commercial development and associated infrastructure; the lack of linkages and habitat connectivity between populations; disease, fire, and invasive weeds; and small population size.

GUSG habitat is managed by a variety of surface owners, including the BLM, the State of Colorado, and private landowners. A number of conservation plans and agreements have been adopted to support the species and its habitat. In April 2005, the BLM Colorado State Office signed the Gunnison Sage-Grouse Rangewide Conservation Plan (RCP), developed by an interagency team led by Colorado Parks and Wildlife (CPW). This plan provides extensive guidance for management of the species by population and on a range-wide basis and addresses conservation issues and maintenance of local populations.

In 2006, the U.S. Fish and Wildlife Service (FWS) and CPW developed a Candidate Conservation Agreement with Assurances (CCAA) to implement conservation measures for GUSG by obtaining agreements with private landowners for GUSG habitat protection and/or enhancements on private lands with the goal of achieving the protection and management necessary to preclude listing. The CCAA would provide incentives to the State of Colorado and private landowners for implementing conservation measures, including regulatory certainty concerning land use restrictions that might otherwise apply should the GUSG become listed under the Endangered Species Act (ESA).

In 2013, the BLM signed a formal Candidate Conservation Agreement (CCA) between the BLM, FWS, CPW, National Park Service, U.S. Forest Service (USFS), Natural Resources Conservation Service, Gunnison County, and Saguache County designed to meet GUSG conservation objectives for development, recreation, and grazing activities on federal lands in the Gunnison Basin in conjunction with ESA consultation requirements. Non-federal entities that conduct activities and uses on and through federal lands are also signatories to the CCA. Conservation measures in the CCA are not intended to address all threats to the GUSG and its habitat. The CCA is designed to complement the statewide CCAA.

In January 2013, the FWS published a proposed rule indicating that listing of the GUSG as an endangered species was warranted, as well as a proposed rule to designate critical habitat for the species. The FWS proposed 1.7 million acres of GUSG critical habitat in Chaffee, Delta, Dolores, Gunnison, Hinsdale, Mesa, Montrose, Ouray, Saguache, and San Miguel counties in Colorado and Grand and San Juan counties in Utah.

In its preliminary finding on the petition to list the GUSG as an endangered species, the FWS identified the inadequacy of regulatory mechanisms to conserve the GUSG and its habitat as a significant threat to the species. The FWS further indicated that the BLM should incorporate conservation measures to protect GUSG habitat into applicable RMPs.

In May 2014, the FWS announced that the United States District Court for the District of Columbia granted a six-month extension of the deadline for a final decision on whether to list the GUSG for protection under the ESA. The extension provides the FWS with additional time to review information received during the public review process to determine whether final listing might be necessary.

BLM Colorado and the FWS are reviewing ongoing, on-the-ground BLM conservation practices as well as measures contained in BLM planning documents, policies, and regulations. In summer 2013, BLM Colorado issued an interim policy to support conservation of GUSG on BLM lands in Colorado. In June 2014, the BLM issued a national Instruction Memorandum (IM) 2014-100 outlining habitat conservation measures for GUSG on BLM lands in Colorado and Utah.

The EIS is targeted for completion by July 2016. As part of this process, the BLM is incorporating relevant science on how GUSG conservation is considered, reasonably interpreted, and accurately presented. Up to eleven land use plans could be amended through this effort to provide consistent management of GUSG habitat across Colorado and Utah for all included BLM-administered lands. The BLM proposes to evaluate GUSG conservation measures within the following RMPs:

Colorado

- San Luis RMP (1991)
- Gunnison RMP (1993)
- San Juan/San Miguel RMP (1985) (currently under revision in the Tres Rios and Uncompahgre RMPs)
- Uncompahgre Basin RMP (1989) (currently under revision in the Dominguez-Escalante National Conservation Area RMP and Uncompahgre RMP)
- Grand Junction RMP (1987) (Currently under revision in the Grand Junction RMP and the Dominguez-Escalante RMP)
- Gunnison Gorge NCA RMP (2004)
- Canyons of the Ancients National Monument RMP (2010)

Utah

- Moab RMP (2008)
- Monticello RMP (2008)

1.2 Purpose and Need for the RMP Amendment and EIS

The purpose of this action is to conserve the GUSG and the ecosystems upon which they depend on public lands administered by the BLM across the range of the species. The GUSG currently inhabits approximately 10 percent or less of its historic habitat within seven scattered populations in southwestern Colorado and southeastern Utah. The State of Utah designated the GUSG as a sensitive species and the State of Colorado labels it a species of special concern. BLM Colorado lists it as sensitive. In 2013, the FWS proposed listing the GUSG as "endangered" under the ESA and determined that the principal threat to GUSG is habitat loss, degradation, and fragmentation.

The BLM has the capability to affect the conservation status of the species through multiple-use and sustained yield management of the approximately 40 percent of GUSG occupied habitat administered by the BLM. The land use planning process is the BLM's key tool, in coordination with interested public parties, for protecting resources and designating uses on federal lands

managed by the BLM. Planning is critical to ensure a coordinated and consistent approach to managing this habitat.

The ESA defines an endangered species as "any species which is in danger of extinction throughout all or a significant portion of its range." In the proposed listing decision for the GUSG, the FWS identified the inadequacy of regulatory mechanisms as a significant threat. The FWS identified conservation measures embedded in RMPs as the BLM's principal regulatory mechanism.

The purpose for the range-wide plan amendments is to identify and incorporate appropriate conservation measures into RMPs in BLM areas across the range of the GUSG in order to conserve, enhance, and restore GUSG habitat by reducing, eliminating, and minimizing threats to the habitat. Because the BLM administers a large portion of GUSG habitat within Colorado and Utah, changes in BLM management of GUSG habitat and proactive steps to rehabilitate habitat are anticipated to have a considerable beneficial impact on present and future GUSG populations and could reduce the need to list the species as threatened or endangered under the ESA.

1.3 Description of the Planning Area

GUSG habitat is found south of the Colorado River in Colorado and Utah. Approximately 5,000 breeding GUSG occur among seven separate populations in southwest Colorado and southeast Utah. The seven separate populations have been delineated according to the following geographical areas:

1. Monticello-Dove Creek (extends into southeast Utah)
2. Piñon Mesa
3. San Miguel Basin
4. Cerro Summit-Cimarron-Sims Mesa
5. Crawford
6. Gunnison Basin (largest population with approximately 4,000 birds)
7. Poncha Pass

A map of the planning area is included in Appendix A. The counties with proposed designated GUSG critical habitat in the planning area are Chaffee, Delta, Dolores, Gunnison, Hinsdale, Mesa, Montrose, Ouray, Saguache, and San Miguel in Colorado and Grand and San Juan in Utah.

1.4 Overview of the Scoping Process

Public involvement is a critical component of the resource planning process. Public involvement activities are designed to maximize the amount of stakeholder involvement in the decision-making process. Federal requirements ensuring that a federal agency makes a diligent effort to involve the public in the NEPA process are codified in 40 Code of Federal Regulations (CFR) Section 1506.6. The BLM Land Use Planning Handbook, H-1601-1 (2005) provides specific guidance regarding the BLM planning process.

Public scoping provides an opportunity for the BLM to involve the public early in a major planning effort and to identify new, and clarify existing, information and issues for consideration when preparing the EIS. The BLM's goal is to develop an RMP Amendment that provides clear and effective management direction. While public involvement occurs throughout the NEPA process, there are three specific opportunities for the public to submit comments to the BLM for consideration:

- Public scoping prior to NEPA analysis in order to help determine the scope of issues and alternatives to be addressed in the RMP/EIS
- Public review of and comment on the Draft RMP/Draft EIS
- Public review of and comment on the Final RMP/Final EIS

Scoping is an early and open process to assist the BLM in determining the scope of issues to be addressed in depth in the analysis for the RMP/EIS. There are two components of scoping—internal and external. Internal scoping is conducted within an agency or with cooperating agencies to determine the preliminary and anticipated issues and concerns. External scoping is a public process designed to engage the public in an effort to elicit significant issues and concerns. Early engagement ensures that issues identified will be properly studied and evaluated. The ultimate goal of scoping is to gather useful information to assist the BLM in developing the proposed action and a balanced range of alternatives.

In accordance with 43 CFR 1610.2(d), the BLM must document the public scoping results. BLM land use planning guidance also requires the documentation of public involvement. This scoping report summarizes the public scoping process, and the separate comments received during the formal external scoping period. In addition, issues from internal and public scoping meetings are described, along with a discussion of how these comments will be incorporated into the RMP/EIS.

1.5 Description of the Scoping Process

1.5.1 Notice of Intent

Per NEPA requirements, the scoping period begins with the publication of a Notice of Intent (NOI) in the Federal Register. The NOI for this project, entitled "Notice of Intent To Incorporate Gunnison Sage-Grouse Conservation Measures Into the Bureau of Land Management Land Use Plans, Colorado and Utah and Prepare an Associated Environmental Impact Statement," appeared in the *Federal Register, Volume 79, No. 138* on July 18, 2014.

The NOI:

- Notes that the scoping period would run from July 18 through August 18, 2014 or fifteen days following the last public meeting.
- Indicates that information regarding public meetings would be published in local media sources and on the BLM project website at least fifteen days in advance.
- Provides the project web address and contact information for the BLM Project Manager.
- Provides information on how to submit scoping comments.
- Provides a brief overview of the FWS proposed rules that triggered this project.
- Provides a list of preliminary planning criteria.
- Includes a list of RMPs with potential to be amended by the BLM to include objectives and conservation measures to protect the GUSG and its habitat.
- States the purpose of the public scoping process.

A copy of the NOI is available in Appendix B and on the GUSG project website at:

www.bit.ly/gunnison_sage-grouse

1.5.2 Project Website

The BLM launched a website to provide public access to a variety of GUSG project information and resources:

www.bit.ly/gunnison_sage-grouse

When launched, the website provided information about the GUSG and planning effort, including the project timeframe and schedule, public comment opportunities, and contact information for the BLM Project Manager and two Public Affairs Specialists, as well as links to the NOI, the BLM ePlanning site, the Washington Office IM, the Gunnison Basin CCA, and a FWS webpage with information on actions related to the GUSG.

Documents and resources have been added as they become available, including scoping meeting locations, the scoping notification postcard, the scoping PowerPoint presentation, maps

displayed at scoping meetings, and a prominent navigation button for providing scoping comments. A sub-page has been added that provides information on cooperating agency roles and responsibilities, along with a list of participating cooperating agencies.

1.5.3 Postcard and Mailing List

In July 2014, the BLM mailed a postcard announcing the start of the public scoping comment period and providing scoping meeting information to 134 representatives of user groups, organizations, elected officials, potential cooperating agencies, and tribal governments. The postcard also provided information on how to submit comments. A copy of the postcard and recipient list is provided in Appendix C on page 37.

1.5.4 Press Release

The BLM issued a press release on July 18, 2014, announcing the scoping period for the GUSG planning effort, providing information on public scoping meetings and the project website, and describing acceptable methods for submitting comments.

The press release was distributed to the following local and regional newspapers: *Boulder Daily Camera*, *Cortez Journal*, *Crested Butte Weekly*, *The Crested Butte News*, *Delta County Independent*, *Denver Business Journal*, *Denver Post*, *The Dolores Star*, *Dove Creek Press*, *The Durango Herald*, *The Durango Telegraph*, *E&E News*, *Fort Collins Coloradoan, Four Corners Free Press*, *Grand Junction Free Press*, *Grand Junction Sentinel*, *Gunnison Country Times*, *High Country News*, *Jackson County Star*, *Lake City World*, *Longmont Times-Call*, *Montrose Daily Press*, *Montrose Mirror*, *Norwood Watch*, *Ouray Plain Dealer*, *Pagosa Springs Sun*, *Pine River Times and El Valle Newspapers*, *Pueblo Chieftain*, *The Rico Bugle*, *Ridgway Sun*, *San Miguel Basin Forum*, *Silverton Standard*, *Southern Ute Drum*, *Telluride Daily Planet*, *Telluride Watch*, *The Watch,* and *Western Slope Watchdog*, as well as the *Associated Press* news agency.

The press release was also provided to the following area radio stations: KOTO, KVNF, KBUT, KVLE, Cumulus Broadcasting, Colorado Radio, Ouray Radio, KSJD, Colorado Public Radio, KNNG FM, KNEC FM, KSTC AM, KNAB AM/FM, and KGIW AM/KALQ FM.

Television stations receiving the press release included: KCNC (CBS Network affiliate), KUSA (NBC Network affiliate), KWGN (CW Network affiliate), and KDVR (FOX Network affiliate).

Information from the press release was also provided to the following blogs: *Telluride Inside and Out*, *The Business of Mining*, *Environmental Leader*, *Energy Manager Today*, and *Energy Biz*.

A copy of the press release is included in Appendix D on page 46.

1.5.5 Public Scoping Meetings

The BLM hosted public scoping meetings in four locations across the range of the GUSG: Golden, Gunnison, Montrose, and Dove Creek, Colorado. The goal of the meetings was to provide the public with opportunities to learn more about the project and interact with and ask questions of BLM resource specialists and other staff. In addition, scoping comment forms were available for the public to fill out and hand deliver at the meetings.

The scoping meetings were divided into three segments: (1) an open house, (2) a PowerPoint presentation, and (3) a question and answer session.

Open House

During the open house portion, the public was able to review poster-sized maps depicting various land designations (including surface, split estate, oil and gas leases, grazing allotments, travel routes, and specially designated land status) across the range of the GUSG. BLM resource specialists stationed near the maps provided the public with opportunities for face-to-face interaction.

PowerPoint Presentation

Following the open house, the GUSG Project Manager delivered a PowerPoint presentation on the BLM GUSG planning effort, which included an overview of FWS proposals to list and designate critical habitat for the GUSG, the goals of public scoping, the BLM planning process, background information on the GUSG and its range, a summary of existing agreements and policies to protect the GUSG, potentially affected RMPs and resource and program areas, a draft project schedule, and acceptable methods for submitting comments.

Question and Answer Session

A contract employee facilitated a question and answer session that enabled the public to ask questions of the GUSG Project Manager and other BLM staff regarding various aspects of the project. The public was reminded that the verbal questions posed did not constitute a formal public scoping comment and that they would still need to submit their comments and issues in writing.

Scoping Materials

A PDF version of the PowerPoint presentation can be found in Appendix G on page 70, copies of the maps are available in Appendix E on page 50, images of the scoping displays are available in Appendix F on page 61, copies of scoping handouts can be found in Appendix H on page 92, and a meeting record for each of the four meetings (including a summary of participant questions) is available in Appendix I on page 101.

1.6 Resource Advisory Councils

BLM Resource Advisory Councils (RACs) are official federal advisory committees that provide advice and recommendations on all aspects of public land management to BLM officials. Each RAC is comprised of fifteen members representing a balanced array of public land resources and uses, including commercial interests, environmental and conservation organizations, elected officials, governmental agencies, tribal interests, academic institutions, and the public-at-large. RACs operate on the principle of collaborative decision-making and strive for consensus before making official recommendations to the BLM.

Three Colorado RACs representing the Front Range, Southwest, and Northwest regions of the state and one Utah RAC will be involved throughout the GUSG planning effort. A meeting of the BLM Colorado Southwest District RAC was held on August 15, 2014 at the Dolores Public Lands Office in Dolores, Colorado. A meeting of the BLM Colorado Front Range District RAC was held on August 20, 2014 in Crestone, Colorado. A meeting of the BLM Colorado Northwest District RAC was held on August 21, 2014 in Kremmling, Colorado. The GUSG Project Manager delivered the same PowerPoint presentation as offered at public scoping meetings and answered questions from RAC members.

Questions ranged from how the RAC could help the BLM during the planning effort and how the FWS proposed listing and critical habitat designation and recovery plan could affect the BLM's work, to the differences between GUSG and Greater Sage-Grouse (and the ongoing planning effort for that species) to how overhead transmission lines might impact the GUSG. Specific questions touched on issues related to travel management, agriculture, and economic impacts. The BLM is committed to maintaining a coordinated effort with the RACs throughout the project.

1.7 Cooperating Agencies

The BLM has invited federal and state agencies and local and tribal governments that could be affected by GUSG planning decisions to serve as cooperating agencies in the NEPA process. Agencies that have signed MOUs with the BLM as of the printing date of this scoping report include:

Federal Agencies

- U.S. Fish and Wildlife Service
- National Park Service
- Forest Service
- Natural Resources Conservation Service

- Bureau of Reclamation
- Office of Surface Mining Reclamation and Enforcement

Colorado State Agencies

- Department of Natural Resources (includes Colorado Parks and Wildlife, Colorado Department of Public Health and Environment, and the Colorado Oil and Gas Conservation Commission)
- Colorado Department of Transportation

Utah State Agencies

- Governor's Office

Colorado Counties

- Delta, Dolores, Gunnison, Mesa, Montrose, Saguache, and San Miguel

Utah Counties

- San Juan

A sample of the cooperating agency letter is provided in Appendix J on page 113.

1.8 Tribal Consultation and Coordination

Upon issuance of the NOI, the BLM began government-to-government coordination and consultation with American Indian tribal governments. On July 9, 2014, the BLM sent each of the tribal governments listed below a letter seeking consultation/coordination. The letters were sent via certified mail with a return receipt requested. A sample of the tribal consultation letter is provided in Appendix K on page 116.

The following tribes were contacted as part of the planning effort:

- The Hopi Tribe
- Jicarilla Apache Nation
- Kewa Pueblo (formerly the Pueblo of Santo Domingo)
- Navajo Nation
- Ohkay Owingeh (Pueblo of San Juan)
- Pueblo of Acoma
- Pueblo de Cochiti
- Pueblo of Isleta

- Pueblo of Jemez
- Pueblo of Laguna
- Pueblo of Nambe
- Pueblo of Picuris
- Pueblo of Pojoaque
- Pueblo of San Felipe
- Pueblo of San Ildefonso
- Pueblo of Sandia
- Pueblo of Santa Ana
- Pueblo of Santa Clara
- Pueblo of Taos
- Pueblo of Tesuque
- Pueblo of Zia
- Southern Ute Indian Tribe
- Ute Indian Tribe (Uintah & Ouray Reservation)
- Ute Mountain Ute Tribe
- White Mesa Ute Council
- Ysleta del Sur Pueblo
- Zuni Tribe of the Zuni Reservation

2. ISSUE SUMMARY

When developing or amending an RMP, the BLM uses a nine-step process identified in the BLM Land Use Planning Handbook. ***Issue identification*** is the first of the nine steps. Planning issues are concerns or controversies about existing and potential land and resource allocations, level of resource use, production, and related management practices. These issues may stem from new information or changed circumstances that cause federal land managers to reassess current situations on federal lands.

Additional policy direction is provided in the BLM *National Sage-Grouse Habitat Conservation Strategy, 1.3.1 Guidance for Addressing Sagebrush Habitat Conservation in BLM Land Use Plans* (November 2004).

2.1 Summary of Public Comments

All written public comments received on or before August 22, 2014 were evaluated and are documented in this Scoping Report. A total of 63 unique written submissions were received, which resulted in 526 unique comments. The most common format used for submission was via e-mail to the project email address. Submissions were also faxed to a project fax number, provided electronically through the BLM ePlanning system via the website, and sent in a hard copy via U.S. mail.

Several steps were used to account for public comments. First, all written comment submissions were given a unique identifier and entered into the database. Each submission was reviewed and individual comments were identified and numbered within the submission. The comments were assigned to a resource planning issue category (such as minerals and energy, wildlife, etc.) and to one of four response categories: (a) an issue to be resolved in the RMP Amendment, (b) an issue to be resolved through policy or administrative action, (c) an issue beyond the scope of the RMP Amendment, or (d) an issue that has already been addressed but should be better communicated to the issue holder.

Of the 526 comments received, 500 were identified as issues for resolution in the RMP Amendment (category a), 5 were determined to be issues to be resolved through policy or administrative action (category b), and 21 comments were noted as beyond the scope of this project (category c). No comments were categorized as issues that had already been addressed, but required improved communication (category d). A summary and analysis of the 500 comments identified as issues for resolution in the RMP Amendment are included in

Section 2.2.1 on page 13. A discussion and summary of the 26 comments/issues not being addressed in this RMP Amendment is included in Section 2.2.2 on page 21.

2.1.1 Commenters by Affiliation

All submissions received were sorted by affiliation of the commenter. Table 1 shows the variety of affiliations and the number of commenters from each category. Letters on business, agency, or organization letterhead or letters in which the commenter signed using an official agency title, were considered to represent that organization or agency. All other letters were considered to represent individuals.

Table 1 - Number of Commenters by Affiliation

Affiliation	Number of Commenters
Individuals	32
Organizations/Non-Profit Groups	14
Local Government	9
Industry	3
State Government	2
Tribal Government	2
Federal Government	1

An alphabetical list of commenters is included in Appendix L on page 119.

2.2 Issues Identified During Scoping

As shown in Table 2, the 500 comments identified for further evaluation in the RMP Amendment/EIS were assigned to fifteen resource or planning issue categories.

2.2.1 Comments by Planning or Resource Issue Category

All comments received were assigned to a planning or resource issue category. Table 2 shows the category name, along with the number of comments assigned to that category. The BLM received 500 total comments and assigned them to fifteen resource/planning issue categories.

Table 2 - Number of Comments by Resource or Planning Issue

Resource or Planning Issue	Number of Individual Comments
Planning Process and Alternatives	114
Data/Best Available Science	54
Energy and Mineral Development	50
Livestock Grazing	47
Fish and Wildlife	42
Recreation and Travel Management	40
Partnerships/Collaboration	37
Social, Economic, and Environmental Justice	30
Lands Realty, and Rights-of-Way	28
Special Management Areas	20
Vegetation Management	15
Drought Management and Climate Change	10
Water, Soil, and Riparian Areas	8
Invasive Species	5
TOTAL	**500**

The following provides a summary of the comments received within each category. Appendix M on page 123 contains the full comment text organized by resource category.

Planning Process and Alternatives

Comments in this category were primarily concerned with the BLM's multiple use mandate, the concepts, and habitat types that should be used in developing alternatives, how to apply adaptive management and mitigation measures, and numerous questions regarding the process, timelines, and how the amendment will interface with projects currently in development, current planning efforts, and existing intergovernmental agreements. A number of comments also focused on the adequacy of, and to what extent existing conservation measures (such as the CCA, RCP, CCAA, 2010 Conservation Measures, and BLM IM 2014-100) should be considered.

Numerous comments emphasized BLM's multiple use mandate and the importance of not allowing GUSG conservation measures to unnecessarily limit existing uses. "The revised RMPs

must not unnecessarily restrict oil and natural gas development and other multiple uses on public lands that overlap GUSG habitat. Instead the revised RMPs should strike a reasonable balance between sustained multiple use and sensible restrictions for the species that are supported by the best and most recent science and data."

With regard to alternatives development, some comments advocated for conservation measures to be developed only for occupied habitat, while others advocated for measures to be developed for suitable habitat or both occupied and unoccupied habitats. One commenter notes that, "Due to significant uncertainty surrounding unoccupied habitat, alternatives developed as part of this EIS process should focus on management of occupied habitat." There were also a few comments regarding what should be considered in the cumulative effects analysis, including the observation that: "Cumulative impacts analysis should also consider threats/impacts from developments adjacent to BLM lands, e.g., residential subdivision development on private lands adjacent to occupied GUSG habitat on BLM land."

This category also included many comments about the importance of adaptive management and developing conservation measures that are flexible and landscape specific. "Adaptive management is a valuable tool for protecting resources in situations where specific mitigation needs are uncertain at the project outset or may change over time. In order for adaptive management to be successful, a detailed adaptive management plan must be defined, including: specific timelines for periodic reviews and adjustments; specific criteria for determining whether additional mitigation measures are needed; specific mechanisms to consider and implement additional mitigation measures; and specific thresholds that would trigger changes in management actions, monitoring or mitigation."

Many comments focused on mitigation, including off-set mitigation and compensatory mitigation, and a number of commenters suggested a priority or hierarchy for developing mitigation measures. One commenter stated that the BLM should, "rely first on avoidance, then on minimization, and only then on mitigation. We are concerned that many (if not almost) off-site mitigation projects have failed to demonstrate an increase in GUSG populations to compensate for the known losses of habitat loss, fragmentation and disturbance. BLM should not use off-setting mitigation as a pretext for waiving habitat protections that would otherwise be applied. Only after protective measures have been fully applied and impacts are still unavoidable should compensatory mitigation be prescribed."

This category also included many questions regarding how the new conservation measures would affect existing requirements and processes, intergovernmental agreements that the BLM has, and how the conservation measures might affect projects with existing operating plans. A commenter asked, "If the species is de-listed, will these new regulations be changed and some of the restrictions be removed? How does the BLM think its plans will be superior to what the affected counties are currently doing? How will these new rules affect the review process for

projects? Will there be a definitive timeframe for review to happen or will the review be open ended and [leave a project] stuck waiting for review?"

Lastly, this category included some comments that made broad statements relative to multiple resource areas or statements specific to a resource, but also included a planning aspect, such as comments related to lands with wilderness characteristics with citations of policies that mandate the BLM to include a lands with wilderness characteristics inventory when embarking on planning processes.

Data/Best Available Science

This category includes comments about mapping sources and numerous comments both for and against the use of conservation measures found in published reports such as the RCP, CCA, and CCAA, and the Greater Sage Grouse National Technical Team Report. Most of these letters cite research studies on impacts and/or mitigation related to utility line siting, overhead predation, noise, electrocution, structures (such as towers and fences), motorized use, grazing, minerals development, and required distances from lek sites.

One commenter stated that: "Throughout the process, we implore BLM to use the best available data and science which is already available…We urge BLM to take a common sense approach to the EIS…and strike an appropriate balance between conservation and multiple use on BLM administered lands."

Energy and Mineral Development

Comments included in this category come primarily from lease holders who wish to be involved in developing conservation measures; comments regarding stipulations to protect GUSG—both too strict and too lenient, the use and development of waivers, exceptions, and modifications, and impacts from noise and lighting (it was noted that other uses also cause noise and light disturbance and there should be mitigation measures imposed on those industries, as well).

Several commenters express concerns regarding BLM IM 2014-100, such as this comment: "We are seriously concerned about the restrictions in BLM IM 2014-100, particularly unjustifiable leasing closures and buffers around leks, and recommend that BLM refrain from including any of those instructions in the revised RMPs. The restrictions in the IM are based on a broad one-size-fits-all management approach that fails to consider state, county, and local plans and efforts to protect GuSG [sic] and its habitat."

Several comments strongly recommend that all critical GUSG habitat be closed to future fluid minerals development and that the BLM impose additional GUSG protections beyond those in current lease stipulations through Conditions of Approval on existing mineral leases.

While the majority of comments in this category are related to oil and gas development, several comments address alternative energy development—solar, wind, geothermal, and biomass.

Livestock Grazing

Comments clearly reflect opposing views on livestock grazing. Some comments note detrimental impacts from cattle grazing and provide suggestions for how to evaluate grazing impacts, as well as management actions that should be taken when land health standards are not being met. Other comments emphasize benefits to the GUSG and local economy from livestock grazing, such as: "Colorado has a healthy and diverse grassland. This region's sage grouse production is in good shape due to decades of cooperation between ranchers and the BLM."

Comments include recommendations on adequate cover and stubble height requirements for GUSG and on modifications to grazing practices during drought years, as well as a couple of recommendations that the BLM should provide for voluntary permit retirement in potential critical habitat on a willing permittee basis in this EIS.

Comments also point to positive and negative impacts of grazing infrastructure on GUSG. "Fences negatively impact sage-grouse in various ways. In addition to posing a collision risk, they facilitate the spread of exotic plants, potentially increase mortality of sage-grouse by increasing predation rates through increased perches for raptors." Lastly, a number of comments recommend that the BLM consider the local economic value of the livestock industry and work with permittees to develop workable conservation measures.

Fish and Wildlife

This category includes comments about GUSG requirements for winter habitat connectivity areas, seasonal closures, and distances from leks to minimize impacts and disturbance. Numerous comments were received regarding lek buffer distances and flexibility in timing restrictions to protect leks. Some comments provide management recommendations for preserving vegetative cover at lek sites and protecting GUSG from activities that cause land surface disturbance and habitat fragmentation. Other comments concern predator control and diseases (including encephalitis, West Nile Virus, and western equine virus) that contribute to GUSG mortality.

Other comments weigh in on whether conservation measures should be developed only for occupied habitat or for both occupied and unoccupied habitat. Some comments recommend tailoring mitigation measures to the Gunnison Basin population and sub-population areas. Several comments express concern about which data sets were used to map critical, occupied, and unoccupied habitat, as well as the need to ground truth the mapping. Recommendations are made on how to prioritize areas for protection, as well as how to prioritize avoidance areas

and mitigation measures. In addition, several comments request specific definitions of habitat categories and the rationale used for development of these areas.

Recreation and Travel Management

The majority of comments in this category are related to motorized recreation on roads and trails within GUSG habitat. Some comments note potential impacts from motorized recreation such as "…destroying vegetation and nests, bringing in noxious weeds, and introducing noise and disturbance into the mating, nesting, brood-rearing and wintering areas," while other comments note the lack of research on the effects of motorized recreation on GUSG and recommend ways to mitigate impacts and still allow for recreation. Additionally, comments from motorized recreation groups emphasize the importance of using a collaborative effort to develop conservation measures to protect GUSG and manage recreation, and emphasize the importance of including the economic value of motorized recreation to the region in the EIS analysis. Some comments offer recommendations for how far roads and trails should be from leks and nesting sites in order to reduce disturbances.

Several comments related to mountain biking include themes similar to those for motorized recreation, such as potential impacts to GUSG from mountain biking, lack of data about the actual effects to GUSG from mountain biking, economic contributions from mountain biking, and the desire to work collaboratively to protect habitat and develop mitigation measures that would allow trail/road access and recreation in GUSG areas to continue. GUSG habitat "coincides with some of the best mountain bicycling experiences within Colorado and Utah…Dispersed tourism is a concern among many of the locals as many rely on these high quality opportunities to bring visitors into their communities for continued viability."

Other comments in this category refer to the need to have restrictions in non-motorized areas to reduce impacts during lekking, nesting, and brood-rearing. Potential impacts from shed antler hunters combing through sagebrush patches within the Crawford population area was specifically mentioned, along with impacts related to lek viewing areas: "The EIS must evaluate and acknowledge that close range viewing of sage grouse leks produces significantly more impacts on sage grouse than motorized recreation which is located some distance away."

Lastly, comments were submitted pertaining to the impact of hunting on the ability to sustain viable GUSG populations: "The analysis should also disclose impacts of the hunting of the Grouse, which is still allowed in at least 8 of the 11 states where it is found. Importantly, Sage Grouse conservation efforts such as seasonal restrictions and bag limits have been quite successful in maintaining healthy populations." Because hunting and GUSG population numbers are regulated by other agencies, this and similar statements related to hunting impacts are included in Response Category (c): *issue beyond the scope of the RMP Amendment of the comments database*.

Partnerships/Collaboration

The majority of comments in this category encourage the BLM to coordinate with local, state, and federal governments—particularly county governments within the GUSG range—as well as tribal governments:

> BLM should build on two decades of successful local, state and federal government and private landowner cooperation to protect the GuSG [sic]. This approach will support the enhancement and sustainability of the GuSG populations on both public and private lands so the species continues to be stable and healthy.

One commenter recommends that the BLM form a "collaborate technical stakeholder team" to include governmental agencies, industries, and conservation groups. A utility industry commenter provides examples of various ways in which mitigation measures are already being implemented and encourages the BLM to coordinate with industry for additional data and studies, particularly related to bird mortality, and to collaborate on transmission line siting.

Several strongly worded messages urge the BLM to work with local groups that have already spent considerable time and energy helping to formulate habitat conservation measures, such as "…local citizens working together to resolve local issues offers the best chance of success. Federal agencies should defer to local working groups that are on the path toward achieving results and should not interfere with or conflict with the work of such groups."

Many user groups stated their desire to work collaboratively with the BLM to develop GUSG conservation measures. Additionally, several comments pointed to agreements already in place to protect the GUSG, including the CCA, various MOUs, and the San Miguel Basin Gunnison Sage-Grouse Conservation Plan. One recommendation is for the BLM to create a group similar to the Greater Sage Grouse National Technical Team to assemble existing scientific data and make recommendations regarding management prescriptions to support GUSG conservation.

Social, Economic, and Environmental Justice

A number of comments in this category recommend that the BLM evaluate the socio-economic impact of conservation measures to local landowners, businesses, and county governments, as well as employment sectors such as recreation, mineral extraction, grazing, coal, geothermal, timber, and ecosystem services:

> When planning for the GUSG BLM needs to maintain an appropriate balance between the need for economic vitality throughout the region with the need to protect the species. This balance would allow the continuance of economic development of resources while affording reasonable, effective protection of the GUSG.

Lands, Realty, and Rights-of-Way

Most of the comments in this category are related to transmission and utility lines and associated vertical structures. While some commenters state that tall structures increase predation, others point to the lack of research specific to the GUSG and the overall lack of data on the impacts of tall structures and power lines, as well as the effectiveness of perch discouragers to minimize predation. Additionally, several comments identify pros and cons associated with burying transmission lines as an alternative to overhead transmission lines. Some comments are directed toward the economic viability of burying transmission lines versus overhead lines, as well as operational constraints associated with locating and maintaining buried lines that should be considered when developing GUSG conservation measures:

> When routing and siting long linear corridors, complete avoidance of GUSG habitat is infeasible in some areas of the overall range. The availability of viable and comprehensive information and data for sage-grouse occurrence and specific habitat types is critical to ensuring our siting processes incorporate sage-grouse conservation into our short- and long-term planning projects.

Special Management Areas

The few comments received in this category are split between requesting that the BLM include an inventory of lands with wilderness characteristics in the RMP Amendment and comments about identifying Areas of Critical Environmental Concern (ACECs) to protect GUSG habitat. Most comments for lands with wilderness characteristics cite agency direction (in BLM manuals 6310 and 6320 and IM 2011-154) requiring the BLM to consider lands with wilderness characteristics and the benefits of doing so specific to GUSG habitat: "By identifying areas where Gunnison sage-grouse habitat overlaps with lands with wilderness characteristics and designating those areas for sage-grouse conservation, BLM can most effectively identify and protect a suite of values on our public lands."

Most comments favor the use of ACECs to protect habitat, often recommending specific types or priority habitat areas for ACEC designation. One comment opposing ACEC designation to protect GUSG states that "due to existing operating restrictions and closures for GUSG and its habitat, designating an ACEC …is unnecessary and would unreasonably restrict responsible economic activities."

A single comment pertaining to wild horses and burros was categorized under special management areas. The comment recommends improving management of wild horse and burro herds, including analysis of the effects of wild horses and burros on GUSG habitat.

Vegetation Management

The few vegetation comments submitted address the need to designate sagebrush reserves to connect habitats and remedy fragmentation; the importance of using native seed to restore and reclaim disturbed areas; the importance of sagebrush to the GUSG diet and for providing structural cover; and there were several comments for and against the use of vegetation treatments (including prescribed fire) to improve GUSG habitat.

Drought Management and Climate Change

A relatively small number of comments (nine) were submitted pertaining to climate change and drought. In general, the comments cite Secretarial Order 3289, which states that the BLM should include the effects of climate change in the GUSG EIS: "The BLM should account for the effects of climate change in management planning for Gunnison Sage-Grouse (Secretarial Order 3289, 02-22-2010; CEQ Memo, 02-18-2010 (draft))." Other statements refer to the regional impacts of drought and the importance of factoring drought and climate effects into the analysis and when developing conservation measures.

Water, Soil, and Riparian Areas

All comments in this category focus on the interrelationship between GUSG riparian habitat requirements and livestock use of riparian areas, including development of water sources and fencing of water structures: "We are concerned that overgrazing by cattle in undeveloped riparian areas, and in proximity to range improvements such as fences and watering sited in and near spring and riparian areas are having significant negative impacts on sage grouse brood-rearing habitats." While some commenters state that developed water sources (such as troughs) provide benefits to GUSG, others express concerns about water sources harboring mosquitoes that carry West Nile Virus, which could pose a threat to GUSG.

Invasive Species

The majority of comments on invasive species pertain to cheatgrass and cite livestock grazing as the primary vector for its spread and colonization on public lands. Oil and gas development and power lines are also identified as land disturbances contributing to the spread of noxious weeds. One comment speaks of the need to minimize the use of herbicides and pesticides to eradicate noxious weeds within GUSG habitat, stating that "insects are an important food source for sage grouse…particularly true during the early brood-rearing phase."

2.2.2 Issues that will not be addressed in the RMP Amendment and EIS

As shown in Table 3, all comments were evaluated and assigned to one of four response categories: (a) issues to be resolved in the RMP Amendment, (b) issues to be resolved through policy or administrative action, (c) issues beyond the scope of the RMP Amendment, or (d)

issues already addressed but requiring improved or additional communication with the issue holder.

Table 3 - Number of Comments by BLM Response Type

Response Category	Number of Comments
Issues to be addressed in the RMP Amendment and EIS	
(a) Issues to be resolved in the RMP Amendment and EIS	500
Issues that will not be addressed in the RMP Amendment and EIS	
(b) Issues to be resolved through policy or administrative action	5
(c) Issues beyond the scope of the RMP Amendment	21
(d) Issues already addressed but requiring improved or additional communication with the issue holder	0

The five comments assigned to response category (b) *Issues to be resolved through policy or administrative action*, are primarily concerned with ensuring that the BLM has adequate funding and staffing in place to implement habitat conservation strategies and management policies and enforce mitigation measures in the field. One commenter notes that the presence of sheep and herders helps to minimize GUSG predation.

Most of the 21 comments assigned to response category (c) *Issues beyond the scope of the RMP Amendment*, are related to the FWS proposed ESA listing for the GUSG—both for and against listing, as well as potential socioeconomic impacts associated with listing. The remaining comments request to be placed on the project mailing list or express an opinion about eliminating GUSG predators through hunting and other predator control methods.

2.3 Anticipated Decisions

Management direction resulting from the planning process for the RMP Amendment must be adaptable to changing conditions and demands. The RMP Amendment will provide management direction and guide decision making for determining appropriate multiple uses and allocation of resources to conserve the GUSG and its habitat. Only RMPs that cover planning areas containing GUSG habitat will be subject to amendment. The RMP Amendment will define desired conditions, management direction, and standards and guidelines.

The BLM is reviewing the current management situation and condition of the environment to identify which management directions providing protection to the GUSG and its habitat should be continued, which should be modified, and which should be developed and added.

This scoping report does not change current management direction set forth in the BLM RMPs under consideration for amendment. The BLM will use the issues identified during scoping—along with subsequently identified issues, planning criteria, and other information (such as occurrence of and development potential for minerals)—during the next phase of the planning process, in order to help formulate a reasonable range of alternatives for conserving the GUSG.

Each identified alternative (including the continuation of existing management practices) will represent a complete plan for conserving GUSG on BLM-administered lands in the planning area. Future decisions will occur at two levels—the RMP level and the implementation level (as described in Section 2.4). Only land use plan-level decisions will be made as part of the RMP Amendment process.

In compliance with NEPA requirements, the BLM will document their evaluation of the identified alternatives in an EIS. The RMP Amendment process will culminate in the signing of a BLM Record of Decision.

2.4 Valid Existing Management to Be Carried Forward

As noted in Section 1.1, the BLM administers public lands in eleven areas across the range of the GUSG in Colorado and Utah. Each of these areas is managed according to direction from a corresponding RMP and any subsequent amendments. In order to incorporate specific conservation measures across the range of the GUSG, these RMPs must be updated or amended.

Any RMP Amendment would establish a consistent land use planning decision to address issues identified by federal agencies and through public scoping. Part of the planning process involves determining which existing management decisions to carry forward. The BLM will review the existing management situation in order to make this determination and will identify where new management guidance should be developed for the GUSG. This review will be documented in the EIS.

2.4.1 Future Land Use Plan-Level Decisions

Future RMP-level decisions will be made on a broad scale. These decisions will identify management direction and guide actions for the coming decades within the planning area. The RMP Amendment will provide a comprehensive yet flexible framework for managing the numerous demands on resources located on public lands while conserving GUSG.

The vision for the RMP Amendment will be described in terms of two categories of RMP-level decisions: (1) desired outcomes and (2) allowable uses and actions to achieve desired outcomes.

Desired outcomes will be expressed in terms of specific goals, standards, and objectives. Goals are broad statements of desired outcomes, such as managing GUSG and their habitats to provide for their conservation and restoration. Standards are descriptions of conditions or the degree of function required, such as land health standards. Objectives are specific, quantifiable, and measurable desired conditions for resources,

After establishing desired outcomes, the agencies will identify the allowable uses (land use allocations) and management actions needed to achieve the goals and objectives. Allocations identify areas where uses are allowed and any restrictions that may be needed to meet goals and objectives in these areas, and areas where uses would be excluded to protect resource values. Management actions are similar in that they are actions that are anticipated to achieve the desired outcomes and include actions to maintain, restore, or improve land health; management actions could be proactive measures, such as measures that would be taken to enhance ecosystem function and condition.

2.5 Special Designations, including Nominations

Special designation areas include ACECs, Wilderness Study Areas, and national trails and byways. While special designations have been made within the existing RMPs across the range of the GUSG, new ACEC designations could potentially be considered during development of the RMP Amendment. ACECs are public lands where special management is required in order to protect an area's significant values. To be eligible for designation as an ACEC, an area must meet criteria for both ***relevance*** and ***importance***. An ACEC possesses significant historic, cultural, or scenic values, fish or wildlife resources (including habitat, communities, or species), natural processes or systems, or natural hazards. In addition, the significance of these values and resources must be substantial in order to satisfy the importance criteria.

Restrictions arising from ACEC designation would be proposed during preparation of the final RMP Amendment, as part of the final decision process. Restrictions would be designed to protect the values and/or serve the purposes for which a designation is made. Management prescriptions are developed expressly to protect the important and relevant values of an area. Such measures would not be necessary or prescribed if the critical and important features were not present.

3. PRELIMINARY PLANNING CRITERIA

Planning criteria are the constraints or ground rules that guide and direct the development of the RMP Amendment, and determine how the planning team approaches the development of alternatives and, ultimately, the selection of a preferred alternative. These criteria focus on the decisions to be made in the RMP Amendment, and (1) provide an initial basis for inventory and data collection needs, and (2) enable managers and staff to develop a preliminary planning base map delineating geographic analysis units.

The following criteria are preliminary and expected to be modified as the public becomes more fully involved in the planning effort:

- The RMP amendments/revisions will be limited to making land use planning decisions specific to the conservation of GUSG and its habitat.
- Lands addressed in the RMP amendments/revisions will be public lands (including split-estate lands) managed by the BLM in GUSG occupied and unoccupied habitats. Decisions in the RMP amendments/revisions will apply only to Federal lands and minerals administered by the BLM.
- The BLM will consider allocative and/or prescriptive standards to conserve GUSG and their habitat on public land, as well as habitat objectives and management actions designed to restore or enhance proposed GUSG unoccupied proposed critical habitat.
- The BLM will use the GUSG Range-Wide Conservation Plan (Range-Wide Steering Committee, 2005), and any other appropriate resources to identify GUSG habitat requirements and best management practices.
- The approved RMP amendments/revisions will be consistent with proposed FWS GUSG conservation measures.
- The approved RMP amendments/revisions will comply with Federal Land Policy and Management Act of 1976, NEPA, and Council on Environmental Quality regulations at 40 CFR parts 1500-1508 and Department of the Interior Regulations at 43 CFR part 46 and 43 CFR part 1600; the BLM H-1601 Land Use Planning Handbook, "Appendix C: Program-Specific and Resource-Specific Decision Guidance Requirements" for affected resource programs; the 2008 BLM NEPA Handbook (H-1790-1); and all other applicable BLM policies and guidance.
- The RMP amendments/revisions will recognize valid existing rights.

- The BLM will use a collaborative and multi-jurisdictional approach, where appropriate, to determine the goals and objectives of public lands for the conservation of GUSG and their habitat.
- The BLM will consult with Indian tribes to identify sites, areas, and objectives important to their cultural and religious heritage within GUSG habitat.
- The BLM will coordinate and communicate with state, local, and tribal governments to include provisions of pertinent plans; seek to resolve inconsistencies between state, local, and tribal plans; and provide ample opportunities for state, local, and tribal governments to comment on the development of amendments or revisions.
- As described by law and policy, the BLM will strive to develop conservation measures that are as consistent as possible with other planning jurisdictions within the planning area boundaries.
- The BLM will consider a range of reasonable alternatives, including appropriate management prescriptions that focus on the relative values of resources while contributing to the conservation of the GUSG and its habitat.
- The BLM will address socioeconomic impacts of the alternatives developed. Socioeconomic analysis will use an accepted input-output quantitative model such as Impact Analysis for Planning or Regional Input-Output Modeling System.
- The BLM will endeavor to use current scientific information, research, technologies and results of inventory, monitoring and coordination to determine appropriate local and regional management strategies that will enhance or restore GUSG habitat.
- GUSG habitat management that intersects with Wilderness Study Areas (WSA) on public lands administered by the BLM will be guided by the BLM Manual Section – 6330 Management of Wilderness Study Areas. Land use allocations made for WSAs must be consistent with the Interim Management Policy and with other laws, regulations and policies related to WSA management.
- For BLM-administered lands, all activities and uses within GUSG habitat will follow existing land health standards. Standards and guidelines for livestock grazing and other applicable programs will be applicable to all alternatives for BLM lands.
- The most current approved BLM corporate spatial data will be supported by current metadata and will be used to ascertain GUSG habitat extent and quality. Data will be consistent with the principles of the Information Quality Act of 2000.
- The BLM will use the FWS and appropriate state game and fish agencies' GUSG data and expertise to the fullest extent practicable in making management determinations on Federal lands. The BLM recognizes state game and fish agencies' jurisdiction as the primary management agencies for species not managed under the ESA.
- The BLM will consider public welfare and safety when addressing fire management.

4. DATA SUMMARY/DATA GAPS

As part of the RMP Amendment planning, evaluation, and data-collection process, the BLM has inventoried available information and identified the following data needs:

- A draft oil and gas reasonably foreseeable development report will be completed for the range of the species and the findings incorporated into the RMP Amendment/EIS.
- A socioeconomic analysis will be completed and used to assess existing socioeconomic conditions and analyze socioeconomic impacts from the proposed alternatives.
- Pending reports for special designation areas, including ACEC evaluations.
- A draft cumulative effects baseline report will be prepared to document current conditions and assess past, present, and future trends at a range-wide level.
- Information obtained in ongoing rapid ecological assessments will be used in analyzing potential impacts on climate change from the proposed alternatives.

Both new data and existing resource information will be used in formulating management alternatives in the RMP Amendment. To facilitate this process, information is being compiled and put into digital format for use in analysis and map production using Geographic Information Systems. Because this information is imperative to quantify resources, update maps, and manipulate information during alternatives development, this process must be completed before analysis can begin. New data generated during the RMP Amendment process will be used to address planning issues and will meet applicable established standards.

5. SUMMARY OF FUTURE STEPS IN THE PLANNING PROCESS

The next phase of the planning process is to formulate draft management alternatives based on issues identified both internally and through public scoping (presented in Section 2 of this report). This range of alternatives will address the planning issues, as well as meet goals and objectives developed by the BLM GUSG interdisciplinary team. In compliance with NEPA, Council on Environmental Quality regulations, and BLM planning regulations and guidance, alternatives should be reasonable and implementable.

The BLM will also meet with cooperating agencies, interested tribes, community groups, and individuals. After a detailed analysis of the alternatives is completed, the BLM will identify a preferred alternative. The preferred alternative is often made up of a blend of components of each alternative in order to provide the best mix and balance of multiple land and resource uses to resolve the issues.

The next opportunity for public comment will be associated with the release of the Draft RMP Amendment and associated Draft EIS. The draft documents will be made available for public review and announced via a Notice of Availability in the Federal Register. The BLM will use the mailing list created for this project as another resource to notify the public of the availability of the draft documents and public meeting information. The BLM expects to host a minimum of four public meetings during the 90-day public comment period on the draft documents.

At the conclusion of the public comment period, the draft documents will be revised and final versions will be published. Following the publication of the final documents, a 30-day public protest period will occur. During this timeframe, the Colorado and Utah State Governor's Offices will have the opportunity to review the documents for consistency with state and local plans, policies, and programs.

Following receipt of final comments during the protest period and governor's consistency review, the documents will be published as final and a Record of Decision will be issued.

All publications, including this report, Notices of Availability, draft and final documents, and any subsequent documents, will be posted to the project website. The website will also include information about public meetings, public comment periods, and project schedule updates.

5.1 Public Involvement Opportunities

The public is invited and encouraged to participate throughout the planning process for the RMP Amendment and EIS. In order to track the progress of the planning effort, the public should periodically check the project website, which is regularly updated with project information, documents, and announcements.

The web address for the BLM GUSG RMP Amendment and EIS is:

www.bit.ly/gunnison_sage-grouse

The BLM will maintain a project mailing list through the duration of the project. The public is welcome to request that their contact information be included on the mailing list, as it is also a method for the BLM to send out future mailings and information.

For more information about this project or to have your name added to the project mailing list, please contact GUSG Project Manager Leigh D. Espy at the BLM Colorado State Office by telephone: (303) 239-3801 or email: lespy@blm.gov

Anyone requiring a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact Ms. Espy during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question. You will receive a reply during normal business hours.

In addition, the following BLM Public Affairs Specialists may be contacted for information regarding this project:

Courtney Whiteman, Public Affairs Specialist, (303) 239-3668
Shannon Borders, Public Affairs Specialist, (970) 240-5399

APPENDICES

Appendix A – Map of Planning Area

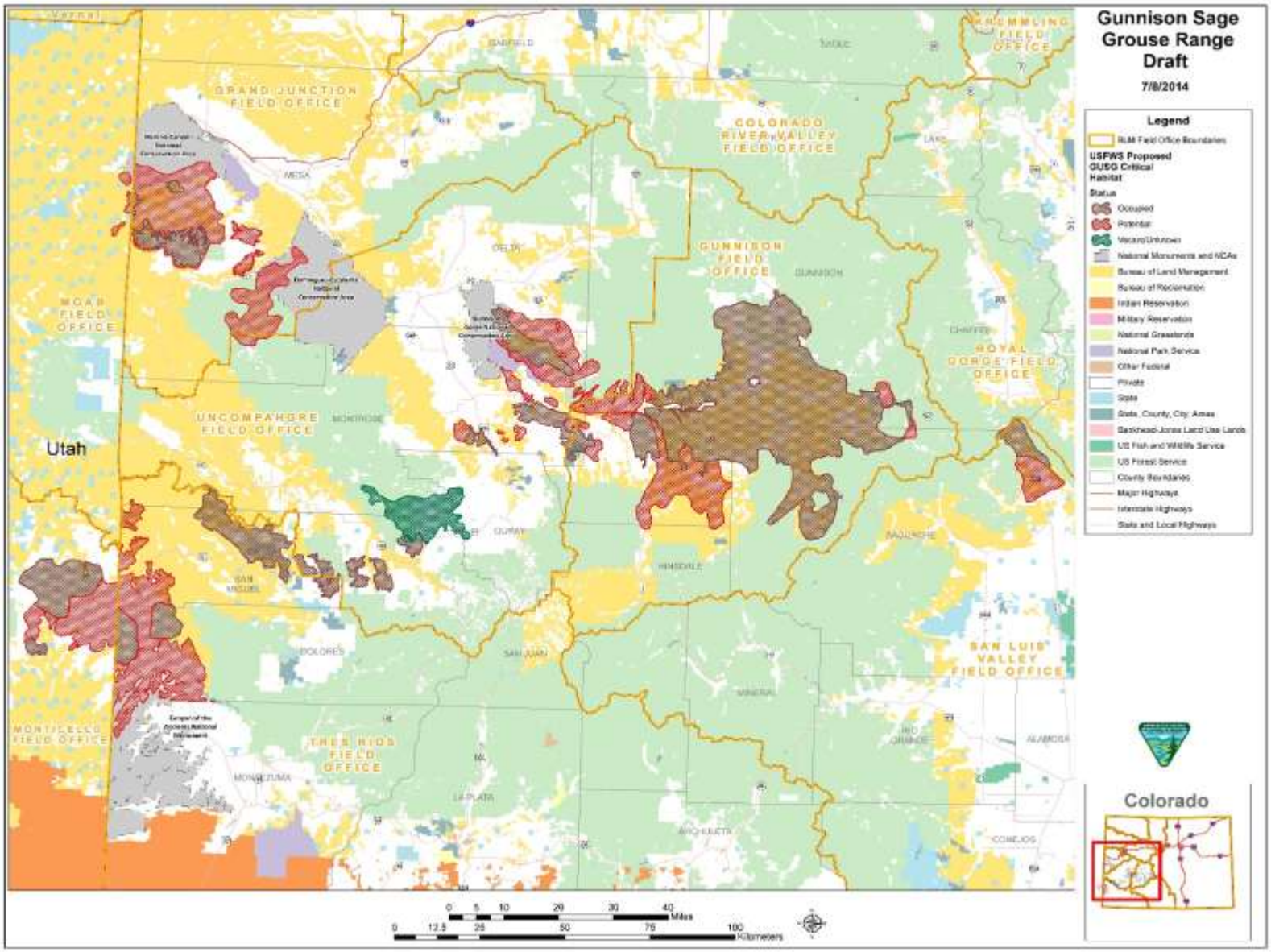

Figure 1 - Map of Planning Area

Appendix B – Federal Register Notice of Intent

Federal Register / Vol. 79, No. 138 / Friday, July 18, 2014 / Notices 42033

location listed in the **ADDRESSES** section during the hours of 9:00 a.m. to 5:00 p.m., Eastern Time, Monday through Friday except for legal holidays. Before including your address, phone number, email address or other personally identifiable information in your comment, you should be aware that your entire comment—including your personally identifiable information—may be made publicly available at any time. While you can ask us in your comment to withhold your personally identifying information from public review, we cannot guarantee that we will be able to do so.

III. Data

OMB Control Number: 1076–0153.

Title: Certificate of Degree of Indian or Alaska Native Blood.

Brief description of collection: Submission of this information allows BIA to verify the applicant's Indian ancestry and to determine the applicant's degree of Indian blood. The applicant will provide information, such as birth certificates, death certificates, and probates to document the applicant's descent from an Indian ancestor(s). BIA uses historic roll(s) or other documents that list the ancestors' name, gender, date of birth, date of death, blood degree and other identifying information to verify the applicant's descent. After the information and supporting documentation has been verified, BIA will issue a CDIB to the applicant. The applicant may use the CDIB to help document their eligibility for BIA programs and services. Other agencies may also rely on a CDIB as proof of eligibility for certain programs and services. CDIBs do not establish membership in an Indian tribe. A CDIB is not an enrollment document. The collection of this information is voluntary. Response is required to obtain or retain a benefit.

Type of Review: Extension without change of a currently approved collection.

Respondents: Individuals.

Number of Respondents: 154,980 per year, on average.

Number of Responses: 154,980 per year, on average.

Frequency of Response: Once.

Estimated Time per Response: 1.5 hours.

Estimated Total Annual Hour Burden: 232,470 hours.

Estimated Total Annual Non-Hour Dollar Cost: $6,199,200.

Dated: July 14, 2014.

Christine Cho,

Acting Assistant Director for Information Resources—Indian Affairs.

[FR Doc. 2014–16967 Filed 7–17–14; 8:45 am]

BILLING CODE 4310–4J–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCO910000 L11100000.DO0000]

Notice of Intent To Incorporate Gunnison Sage-Grouse Conservation Measures Into the Bureau of Land Management Land Use Plans, Colorado and Utah and Prepare an Associated Environmental Impact Statement

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Intent.

SUMMARY: In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and the Federal Land Policy and Management Act (FLMPA) of 1976, as amended, the Bureau of Land Management (BLM) intends to incorporate Gunnison Sage-Grouse Conservation Measures into Resource Management Plans (RMPs) within the range of the species and prepare an associated Environmental Impact Statement (EIS). By this notice, the BLM is announcing the beginning of the scoping process to solicit public comments and identify issues.

DATES: This notice initiates the public scoping process for the EIS. Comments on issues may be submitted in writing until August 18, 2014. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through local news media, newspapers and the BLM Web site at: *http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse/GUSG.html*. In order to be included in the analysis, all comments must be received prior to the close of the 30-day scoping period or 15 days after the last public meeting, whichever is later. Comments that are specific to a particular area or land use plan should be identified as such. We will provide additional opportunities for public participation upon publication of the Draft EIS.

ADDRESSES: You may submit comments on issues and planning criteria related to Gunnison Sage-Grouse planning effort by any of the following methods:

- Web site: *http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse/GUSG.html*; Email: *gusg_amend@blm.gov*.
- Fax: 303–239–3699.
- Mail: Colorado State Office, 2850 Youngfield Street, Lakewood, CO 80215.

Documents pertinent to this proposal may be examined at the Colorado State Office (see address above); the Colorado Southwest District Office, 2465 South Townsend Avenue, Montrose, CO 81401; and Utah Canyon County District Office, 82 East Dogwood, Moab, UT 84532.

FOR FURTHER INFORMATION CONTACT: Leigh D. Espy, Project Manager, via telephone: 303–239–3801; at the Colorado State Office (see address above); or via email: *lespy@blm.gov*. You may contact Ms. Espy to have your name added to our mailing list. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, seven days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: In January 2013, the U.S. Fish and Wildlife Service (FWS) published its proposed listing and proposed critical habitat decision for the Gunnison Sage-Grouse indicating that listing of the species as "Endangered" was warranted. The inadequacy of regulatory mechanisms to conserve the Gunnison Sage-Grouse and its habitat was identified as a significant threat in the FWS preliminary finding on the petition to list the Gunnison Sage-Grouse as an endangered species. The FWS has proposed conservation measures to be included in RMPs as the principal mechanism to assure adequate conservation of the Gunnison Sage-Grouse and its habitat on public lands. In view of the identified threats to the Gunnison Sage-Grouse, the BLM proposes incorporating consistent objectives and conservation measures to protect Gunnison Sage-Grouse and its habitat into RMPs by July 2016. The BLM plans to prepare an EIS to analyze proposed amendments within the range of the species for the following RMPs:

- Colorado
  - San Luis RMP (1991)
  - Gunnison RMP (1993)
  - San Juan/San Miguel RMP (1985) (currently under revision in the Tres Rios and Uncompahgre RMPs)
  - Uncompahgre Basin RMP (1989) (currently under revision in the Dominquez-Escalante National Conservation Area [NCA] RMP and Uncompahgre RMP)
  - Grand Junction RMP (1987) (Currently under revision in the Grand

Junction RMP and the Dominquez-Escalante NCA RMP)

- ○ Gunnison Gorge NCA RMP (2004)
- ○ Canyons of the Ancients National Monument RMP (2010)
- Utah
- ○ Moab RMP (2008)
- ○ Monticello RMP (2008)

Where an ongoing plan revision or amendment may not be completed by July 2016, the date of the underlying completed RMP is also listed, as it may be amended as part of this EIS effort. This amendment may modify planning decisions in the NCAs and/or the National Monument listed above, consistent with the designation.

The purpose of the public scoping process is to determine relevant issues relating to the conservation of the Gunnison Sage-Grouse and its habitat that will influence the scope of the environmental analysis, including alternatives, and guide the process for developing the EIS. The BLM and FWS identified preliminary issues for the planning areas, including sagebrush habitat management practices, science directly applicable to protection of the Gunnison Sage-Grouse, and the effects of sagebrush habitat management on other public land resources including: Fluid minerals, coal mining, hard rock mining, mineral materials, renewable energy development, rights-of-way (including transmission), invasive species, livestock grazing, vegetation management, fire, land tenure, off-highway vehicle management, and recreation. Additionally, as part of this EIS and planning process, the BLM intends to identify and apply appropriate mitigation objectives and management actions to meet conservation objectives for the Gunnison Sage-Grouse. These objectives and management actions could include on-site and regional mitigation measures. Preliminary planning criteria include:

- The BLM will consider allocative and/or prescriptive standards to conserve Gunnison Sage-Grouse and their habitat on public land, as well as habitat objectives and management actions designed to restore or enhance proposed Gunnison Sage-Grouse unoccupied proposed critical habitat.
- The BLM will use the Gunnison Sage-Grouse Rangewide Conservation Plan (Rangewide Steering Committee, 2005), and any other appropriate resources to identify Gunnison Sage-Grouse habitat requirements and best management practices.
- The BLM will consider FWS-developed Gunnison Sage-Grouse conservation measures.
- The planning effort will comply with FLPMA; NEPA; Council on Environmental Quality regulations at 40 CFR parts 1500–1508; Department of the Interior Regulations at 43 CFR part 46 and 43 CFR part 1600; the BLM *H–1601 Land Use Planning Handbook*, "Appendix C: Program-Specific and Resource-Specific Decision Guidance Requirements" for affected resource programs; the 2008 BLM NEPA Handbook (H–1790–1); and all other applicable BLM policies and guidance.
- The planning effort will be limited to making land use planning decisions specific to the conservation of Gunnison Sage-Grouse and its habitat.
- The BLM will consider land use allocations and/or prescriptive standards to conserve Gunnison Sage-Grouse habitat, as well as objectives and management actions to restore, enhance and improve Gunnison Sage-Grouse habitat.
- The planning effort will recognize valid existing rights.
- Lands addressed in the RMP amendments/revisions will be public lands (including split-estate lands) managed by the BLM in Gunnison Sage-Grouse occupied and unoccupied habitats. Decisions in the RMP amendments/revisions will apply only to Federal lands and minerals administered by the BLM.
- The BLM will use a collaborative and multi-jurisdictional approach, where appropriate, to determine the goals and objectives of public lands for the conservation of Gunnison Sage-Grouse and their habitat.
- The BLM will consider a reasonable range of alternatives, including appropriate management prescriptions that focus on the relative values of resources while contributing to the conservation of the Gunnison Sage-Grouse and sage-grouse habitat.
- The BLM will address socioeconomic impacts of the alternatives developed. Socioeconomic analyses will use an accepted input-output quantitative model such as Impact Analysis for Planning or Regional Input-Output Modeling System.
- The BLM will use current scientific information, research, technologies, and results of inventory, monitoring, and coordination to determine appropriate local and regional management strategies that will enhance or restore Gunnison Sage-Grouse habitat.
- Gunnison Sage-Grouse habitat management that intersects with Wilderness Study Areas (WSA) on public lands administered by the BLM will be guided by the *BLM Manual Section—6330 Management of Wilderness Study Areas*. Land use allocations made for WSAs must be consistent with laws, regulations and policies related to WSA management.
- For BLM-administered lands, all activities and uses within Gunnison Sage-Grouse habitat will follow existing land health standards. Standards and guidelines for livestock grazing and other applicable programs will be applicable to all alternatives for BLM lands.
- The BLM will consult with Indian tribes to identify sites, areas and objectives important to their cultural and religious heritage within Gunnison Sage-Grouse habitat.
- The BLM will coordinate and communicate with state, local and tribal governments to ensure the BLM considers provisions of pertinent plans; seek to resolve inconsistencies between state, local and tribal plans; and provide ample opportunities for state, local and tribal governments to comment on the development of amendments or revisions.
- The planning effort will be based on the principles of Adaptive Management.
- The most current approved BLM corporate spatial data will be supported by current metadata and will be used to ascertain Gunnison Sage-Grouse habitat extent and quality. Data will be consistent with the principles of the Information Quality Act of 2000.
- The BLM will use the FWS and appropriate State game and fish agencies' Gunnison Sage-Grouse data and expertise to the fullest extent practicable in making management determinations on Federal lands. The BLM recognizes State game and fish agencies' jurisdiction as the primary management agencies for species not managed under the Endangered Species Act.

You may submit comments on issues and planning criteria in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the **ADDRESSES** section above. To be most helpful, you should submit comments by the close of the 30-day scoping period or within 15 days after the last public meeting, whichever is later.

The public is also invited to nominate or recommend areas on public lands for Gunnison Sage-Grouse and its habitat within the planning areas identified above to be considered as Areas of Critical Environmental Concern as a part of this planning process (BLM Manual 1613.3.31).

Parties interested in leasing and development of Federal coal in the planning areas should provide coal resources data for their area(s) of

interest. Specifically, information is requested on the location, quality and quantity of Federal coal with development potential, and on surface resource values related to the 20 coal unsuitability criteria described in 43 CFR part 3461. This information will be used for any necessary updating of coal screening determinations (43 CFR 3420.1–4) in the Decision Area and in the environmental analysis.

The BLM will use the NEPA public participation requirements to assist the agency in satisfying the public involvement requirements under Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470(f)) pursuant to 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed action will assist the BLM in identifying and evaluating impacts to such resources in the context of both NEPA and Section 106 of the NHPA. The BLM will consult with Indian tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration. Federal, state and local agencies, along with tribes and other stakeholders that may be interested in or affected by the proposed action the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency.

The BLM will evaluate identified issues to be addressed in the plan amendments/revisions, and will place them into one of three categories:

1. Issues to be resolved in the plan;
2. Issues to be resolved through policy or administrative action; or
3. Issues beyond the scope of this plan.

The BLM will provide an explanation in the Draft EIS as to why an issue was placed in category two or three. The public is also encouraged to help identify any management questions and concerns that should be addressed in the plan amendments/revisions. The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional and national needs and concerns.

The BLM will use an interdisciplinary approach to develop the plan amendments in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Rangeland management, minerals and geology, vegetation management, fire, outdoor recreation, wildlife, lands and realty, hydrology, soils, sociology, and economics.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Authority: 40 CFR 1501.7 and 43 CFR 1610.2.

David McCormack,
Acting BLM Colorado State Director.

[FR Doc. 2014–16819 Filed 7–17–14; 8:45 am]

BILLING CODE 4310–JB–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[L12200000. MA0000/LLUTY00000]

Notice of Proposed Supplementary Rules for Public Lands Managed by the Moab and Monticello Field Offices in Grand and San Juan Counties, UT

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Proposed Supplementary Rules.

SUMMARY: In accordance with the Records of Decision (ROD) for the Moab and Monticello Field Office Approved Resource Management Plans (RMP) and associated Environmental Impact Statements (EIS), the Bureau of Land Management (BLM) is proposing supplementary rules and requesting comments. The proposed rules address conduct on BLM public land in Grand County and San Juan County, Utah. The conduct addressed includes the operation of motorized or mechanized vehicles, camping and campfires, firewood and petrified wood collection, and the use of glass containers.

DATES: Comments on the proposed supplementary rules must be received or postmarked by September 16, 2014 to be assured of consideration.

ADDRESSES: Comments may be submitted by mail, hand delivery, or email to the BLM Canyon Country District Office, Attention: Jason Moore, 82 East Dogwood Avenue, Moab, UT 84532, or *jdmoore@blm.gov*. The proposed supplementary rules and approved RMPs are available for inspection at the BLM Moab Field Office, located at 82 East Dogwood Avenue, Moab, UT; the BLM Monticello Field Office, located at 435 North Main Street, Monticello, UT; and, on the BLM Moab and Monticello Field Office Web sites: *http://www.blm.gov/ut/st/en/fo/moab.html* and *http://www.blm.gov/ut/st/en/fo/monticello.html*.

FOR FURTHER INFORMATION CONTACT: Jason Moore, Supervisory Staff Law Enforcement Ranger, 82 East Dogwood Avenue, Moab, UT 84532, 435–259–2109, or *jdmoore@blm.gov*. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to leave a message or question with the above individual. The FIRS is available 24 hours a day, 7 days a week. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION:

I. Public Comment Procedures
II. Background
III. Discussion
IV. Procedural Matters
V. Proposed Supplementary Rules for the BLM Moab Field Office and the Monticello Field Office

I. Public Comment Procedures

Written comments on the proposed supplementary rules must be sent in accordance with the information outlined in the **DATES** and **ADDRESSES** sections of this notice. The BLM is not obligated to consider comments that are received after the close of the comment period (see **DATES**), unless they are postmarked or electronically dated before the deadline; or if the comments are delivered to an address other than that listed above in **ADDRESSES**. Comments should be specific, confined to issues pertinent to the proposed supplementary rules, and should explain the reason for any recommended change. Where possible, comments should reference the specific section or paragraph of the rule that the comment is addressing.

Comments, including names, addresses, and other contact information of respondents, will be available for public review at the BLM Moab Field Office, 82 East Dogwood Avenue, Moab, UT 84532, during regular business hours (7:45 a.m.–4:30 p.m., Monday through Friday, except Federal holidays). Before including an address, telephone number, email address, or other personal identifying information in your comment, be aware that the entire comment, including personal identifying information, may be made publicly available at any time. While you can ask in your comment to

Appendix C – Scoping Postcard and Mailing List

BLM Gunnison Sage-Grouse Range-wide Land Use Plan Amendment

Public Scoping - July 18 through August 22, 2014

GOAL: To identify and adopt clear and consistent objectives and conservation measures to protect Gunnison Sage-Grouse habitat across the species' range

PUBLIC MEETINGS 6-8 PM

Information • Resource Specialists • Q&A Sessions

- Monday, August 4 - Denver Marriott West, 1717 Denver West Blvd, Golden, CO 80401
- Tuesday, August 5 - Fred R Field Western Heritage Center Multi-Purpose Building, 275 S Spruce St, Gunnison, CO 81230
- Wednesday, August 6 - Holiday Inn Express, 1391 S Townsend Ave, Montrose, CO 81401
- Thursday, August 7 - Dove Creek High School, 525 N Main St, Dove Creek, CO 81324

Concise written information and observations submitted by August 22 will help the BLM identify significant issues and formulate reasonable alternatives to be analyzed. Provide your input at meetings or by:

EMAIL: gung_amend@blm.gov

FAX: 303.239.3699

USPS MAIL:
BLM Colorado State Office
ATTN: Gunnison Sage-Grouse EIS
2850 Youngfield Street
Lakewood, CO 80215

BLM Gunnison Sage-Grouse Range-wide Land Use Plan Amendment

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Lakewood, CO 80215

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2850 Youngfield Street
Lakewood, CO 80215

Information about the Gunnison Sage-Grouse Plan Amendment is available online at:
http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse/GUSG.html

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Superintendent
Mesa Verde National Park
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Environmental and Energy Office
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Land Use Director
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Orrin Hatch
U.S. Senator
104 Hart Office Building
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Chris Bove
Gunnison Field Office - Gunnison County
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Gunnison, CO 81230-2162

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Citizens for Gunnison County
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Matt Vasquez, Wildlife Biologist
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Grand Junction, CO 81501

Delta County Board of Commissioners
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Delta, CO 81416

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Chairperson
Montrose County Board of Commissioners
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Montrose, CO 81401

Ernest Williams
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Denver, CO 80222

John T. Salazar
Commissioner
Colorado Division of Agriculture
305 Interlocken Parkway
Broomfield, CO 80021

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Pueblo of Isleta
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Isleta, NM 87022

Appendix D – Press Release

Bureau of Land Management 2850 Youngfield Street • Lakewood, Colorado 80215
BLM COLORADO NEWS

FOR IMMEDIATE RELEASE

Contacts: Shannon Borders, (970) 240-5399
Courtney Whiteman, (303) 239-3668

July 17, 2014

BLM begins public scoping on Gunnison Sage-Grouse Environmental Impact Statement

DENVER – As part of a collaborative effort to protect wildlife and promote balanced development on public lands, the Bureau of Land Management is seeking public input to identify conservation measures to protect Gunnison Sage-Grouse within the bird's habitat on federally-managed lands in Colorado and Utah.

Based on the U.S. Fish and Wildlife Service's recommendation to adopt additional conservation measures, the BLM is initiating a public scoping process to incorporate these measures into up to 11 BLM Resource Management Plans through an Environmental Impact Statement and associated amendment. The EIS is slated for completion by July 2016.

"The BLM has already taken a number of steps to ensure balanced management of public lands in the species' range," said Ruth Welch, BLM Colorado State Director. "As we work with the U.S. Fish and Wildlife Service and other federal, state and local partners to conserve important habitat for wildlife, this public process will be helpful in understanding, minimizing and addressing threats to the Gunnison Sage-Grouse. We look forward to hearing from the public as we seek to understand what additional conservation measures may be appropriate for the Bureau of Land Management to take."

The range-wide amendment process will enable the BLM to examine issues across the range of species and consider conservation and mitigation measures on a landscape scale. The EIS will amend RMPs within several BLM offices to address conservation measures and ensure adequate conservation of the Gunnison Sage-Grouse and its habitat on public lands.

Last month, the BLM issued an Instruction Memorandum guiding management of Gunnison Sage-Grouse as an interim measure until an amendment process can be completed. The IM only applies to proposed occupied critical Gunnison Sage-Grouse habitat on BLM-managed lands. The EIS, once completed, will consider both proposed occupied and unoccupied critical Gunnison Sage-Grouse habitat on BLM lands.

The IM builds on existing protections for Gunnison Sage-Grouse, which have been established through BLM policy as well as partnerships at the state, local, private and federal level. It also extends habitat management strategies established in a BLM Colorado IM in 2013 to include southeast Utah, outlining the BLM's policy of deferring oil and gas leasing on proposed occupied critical habitat until associated land use plans have been amended or revised to avoid affecting future management decisions.

The public scoping process reflects the landscape-level approach emphasized under Interior Secretary Sally Jewell's Secretarial Order 3330, which established a coordinated Department-wide strategy to strengthen mitigation practices. This approach shifts the focus from determining appropriate mitigation on a permit-by-permit basis to a strategic and landscape-level perspective where mitigation can be identified through regional strategies and land use planning. This strategy places primary focus on avoidance of resource conflicts because it is the most effective form of mitigation and because avoiding sensitive areas allows for a more efficient and predictable permitting process. Where resource conflicts cannot be avoided, meaningful minimization and mitigation of the impacts should be implemented, along with a monitoring program to evaluate the efficacy of these measures.

Gunnison Sage-Grouse can be found in southwest Colorado and southeast Utah. About 5,000 breeding Gunnison Sage-Grouse occur among seven separate populations on more than 700,000 acres of BLM lands, including split estate.

Gunnison Sage-Grouse require a variety of habitats including large expanses of sagebrush with a diversity of grasses and forbs as well as healthy wetland and riparian ecosystems. The birds also require sagebrush for cover and fall and winter food.

The public is invited to four public meetings to learn more about the project:

- Monday, August 4 at 6 p.m.
  - Denver Marriott West, 1717 Denver West Blvd., Golden, CO 80401
- Tuesday, August 5 at 6 p.m.
  - Fred R. Field Western Heritage Center, Fairgrounds and Multi-Purpose Building, 275 Spruce St., Gunnison, CO 81230
- Wednesday, August 6 at 6 p.m.
  - Holiday Inn Express Montrose, 1391 S. Townsend Ave., Montrose, CO 81401
- Thursday, August 7 at 6 p.m.
  - Dove Creek Community Center, 403 W. 7th St., Dove Creek, CO 81324

Additional information is also available on the project website at http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse.html. Written comments should be submitted by August 22, via mail to BLM Colorado, Attn: Gunnison Sage-Grouse EIS,

2850 Youngfield Street, Lakewood, CO 80215-7093; via email to gusg_amend@blm.gov; or via fax to (303) 239-3699.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

The BLM manages more than 245 million acres of public land, the most of any Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's mission is to manage and conserve the public lands for the use and enjoyment of present and future generations under our mandate of multiple-use and sustained yield. In Fiscal Year 2013, the BLM generated $4.7 billion in receipts from public lands.

- BLM -

Appendix E – Scoping Maps

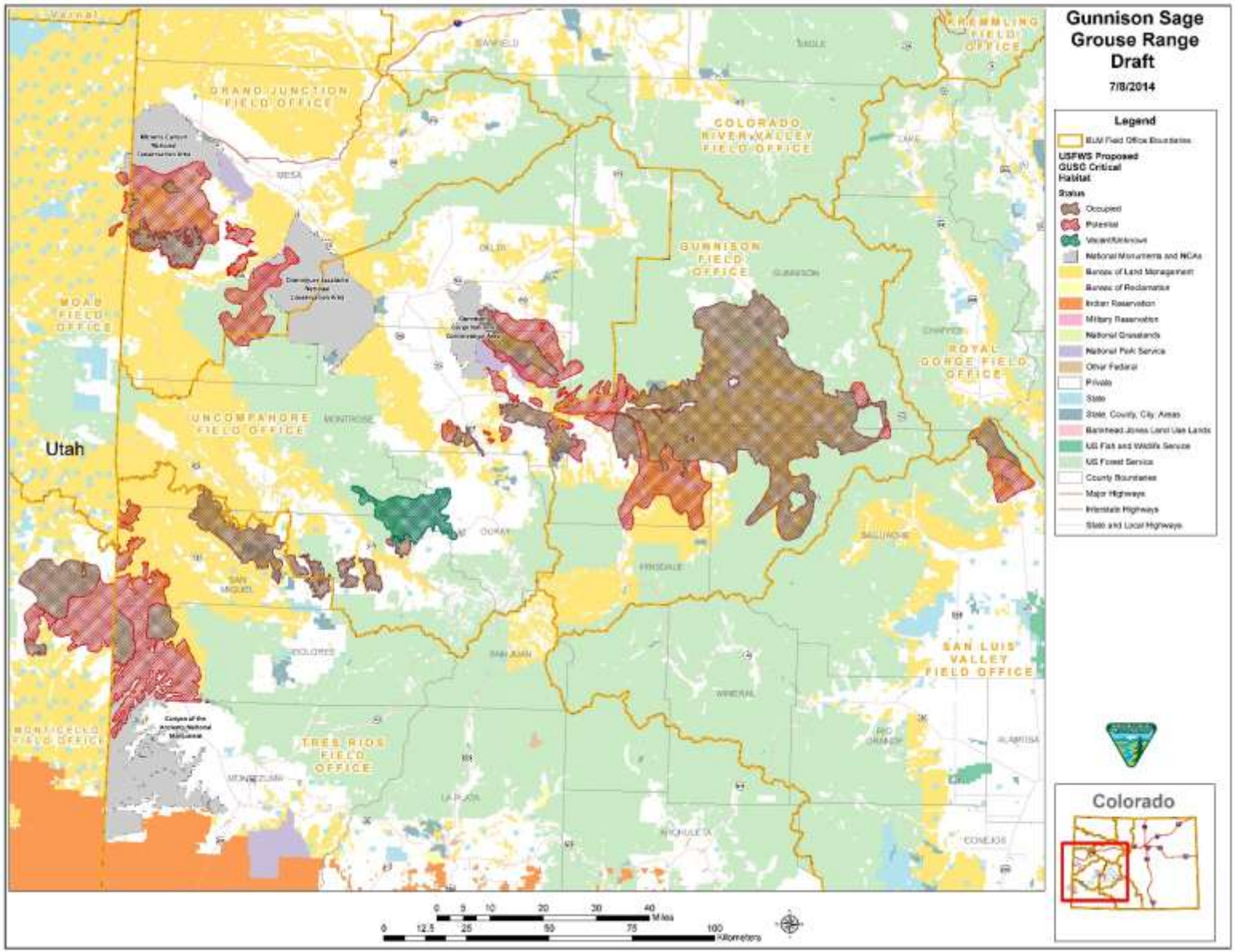


Figure 2 - Map of Draft Gunnison Sage-Grouse Range

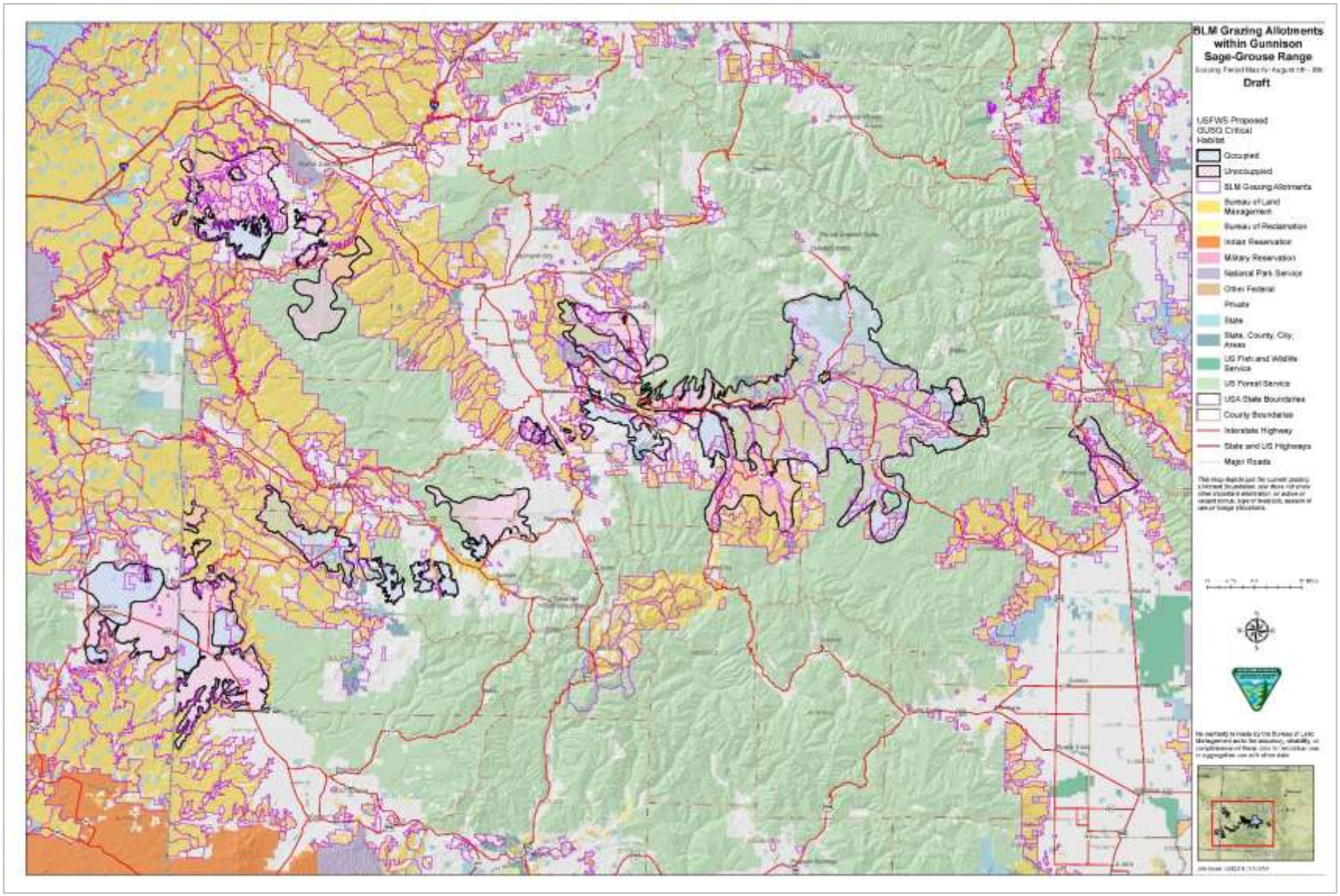


Figure 3 - Map of BLM Grazing Allotments within GUSG Range

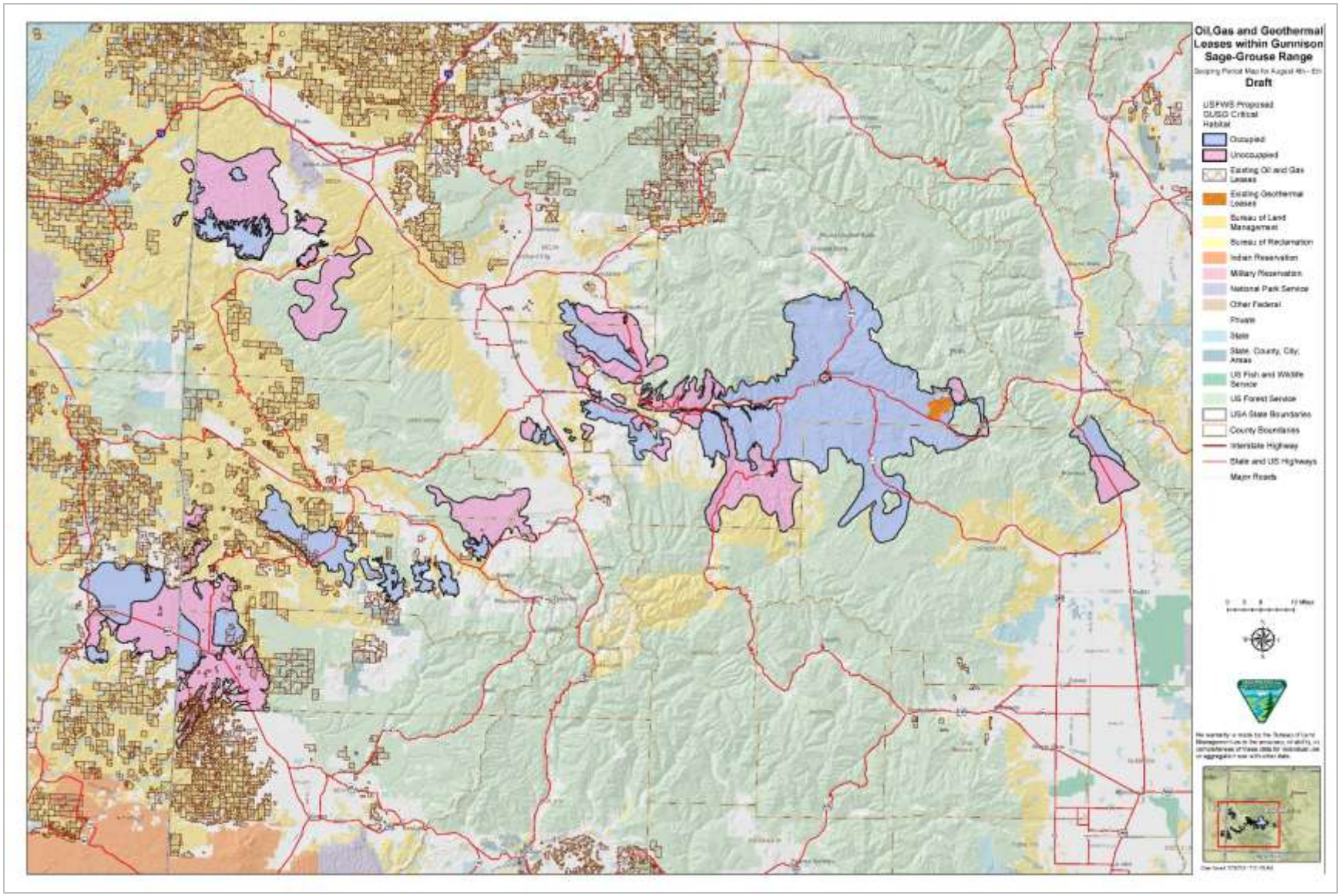


Figure 4 - Map of Oil, Gas and Geothermal Leases within GUSG Range

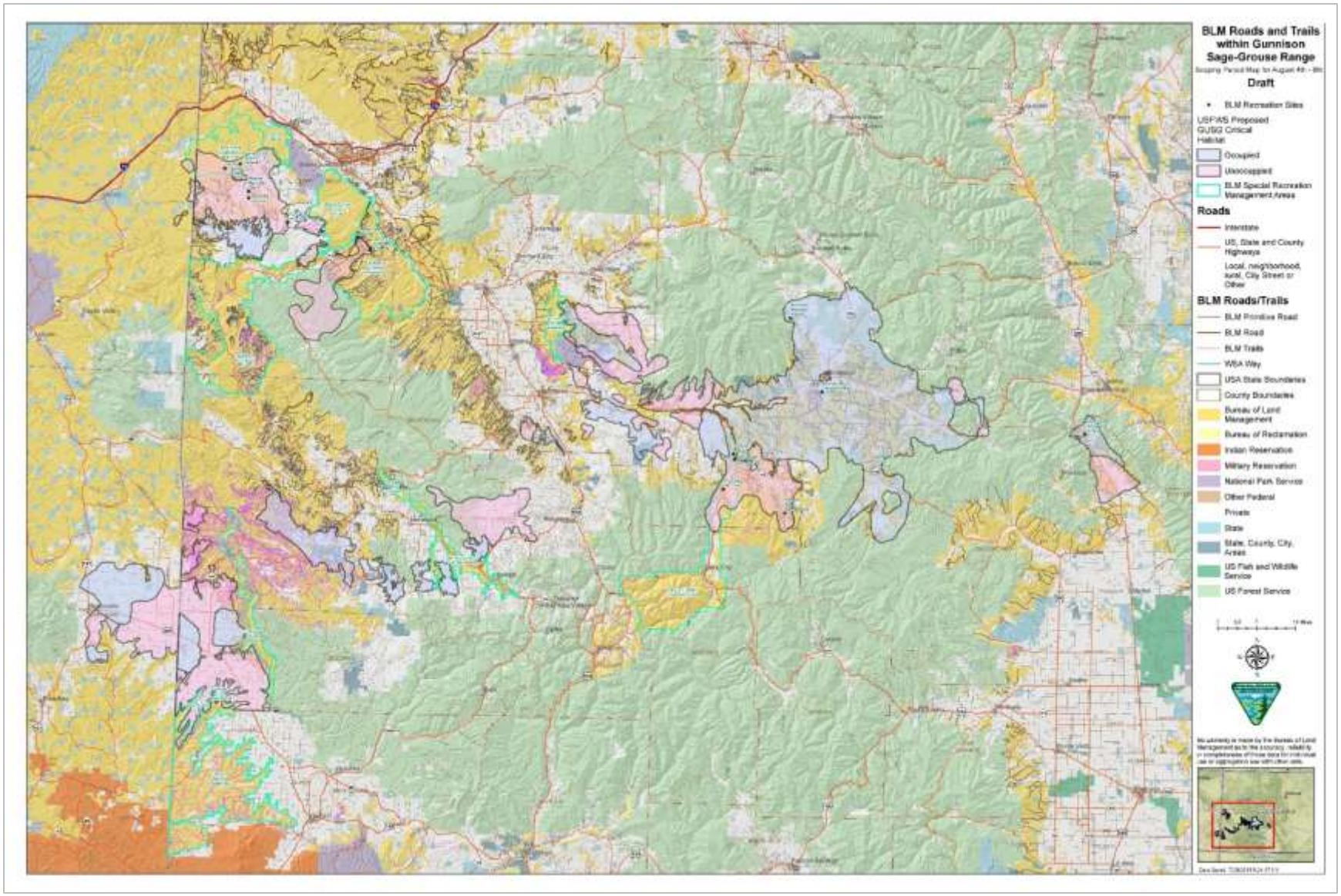


Figure 5 - Map of BLM Roads and Trails within GUSG Range

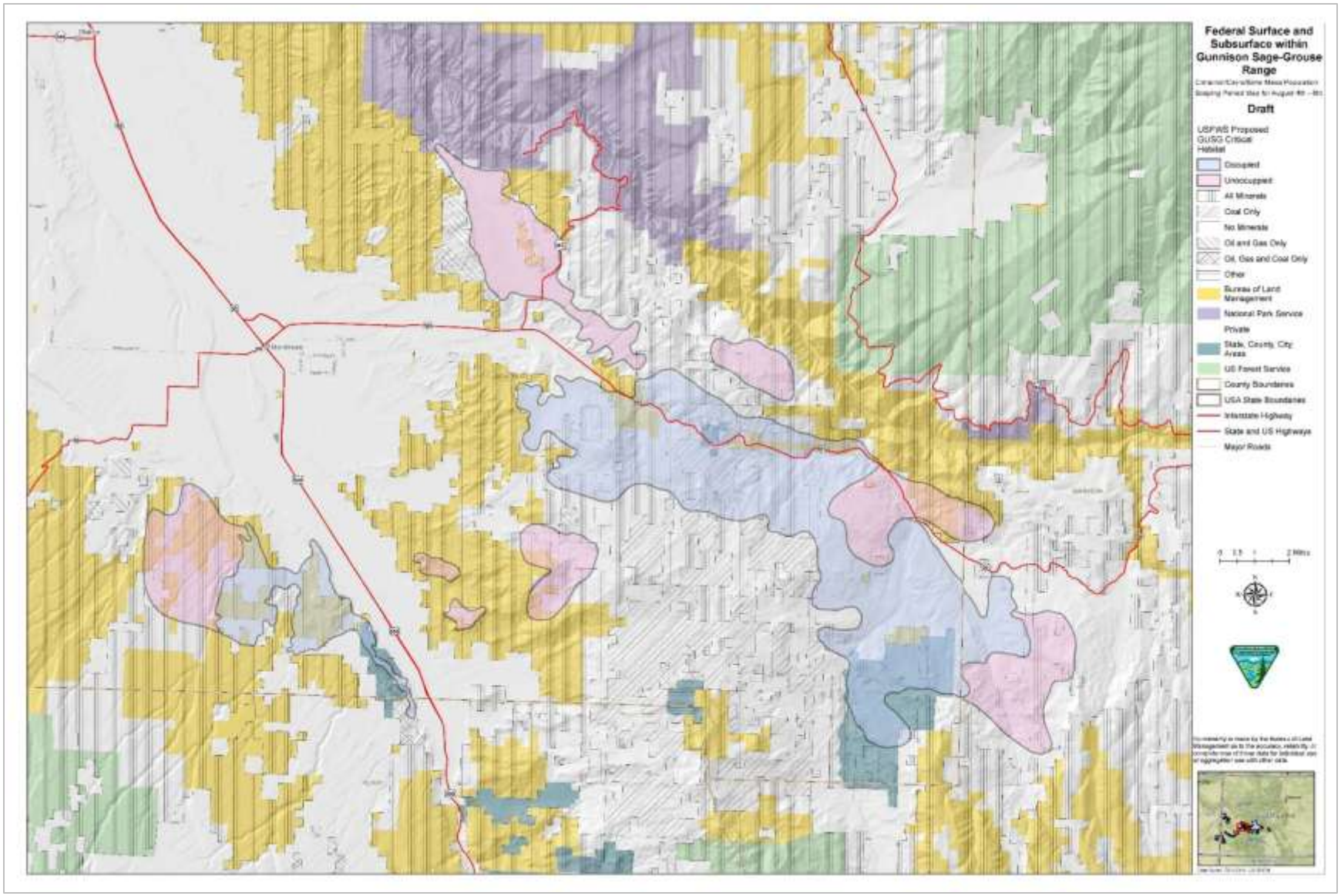


Figure 6 - Map of Federal Surface and Subsurface, Cimarron/Cerro/Sims Mesa Population

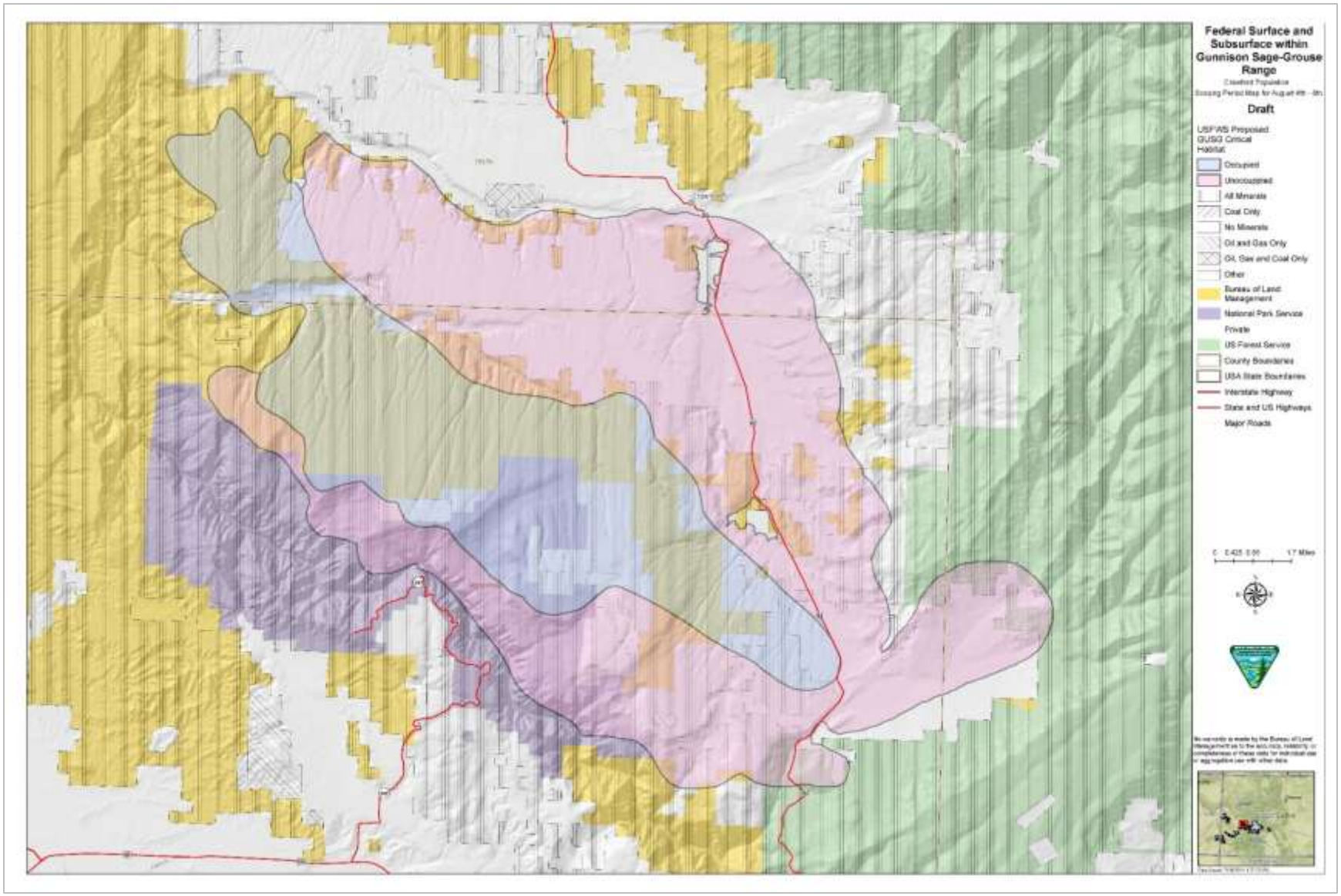


Figure 7 - Map of Federal Surface and Subsurface, Crawford Population

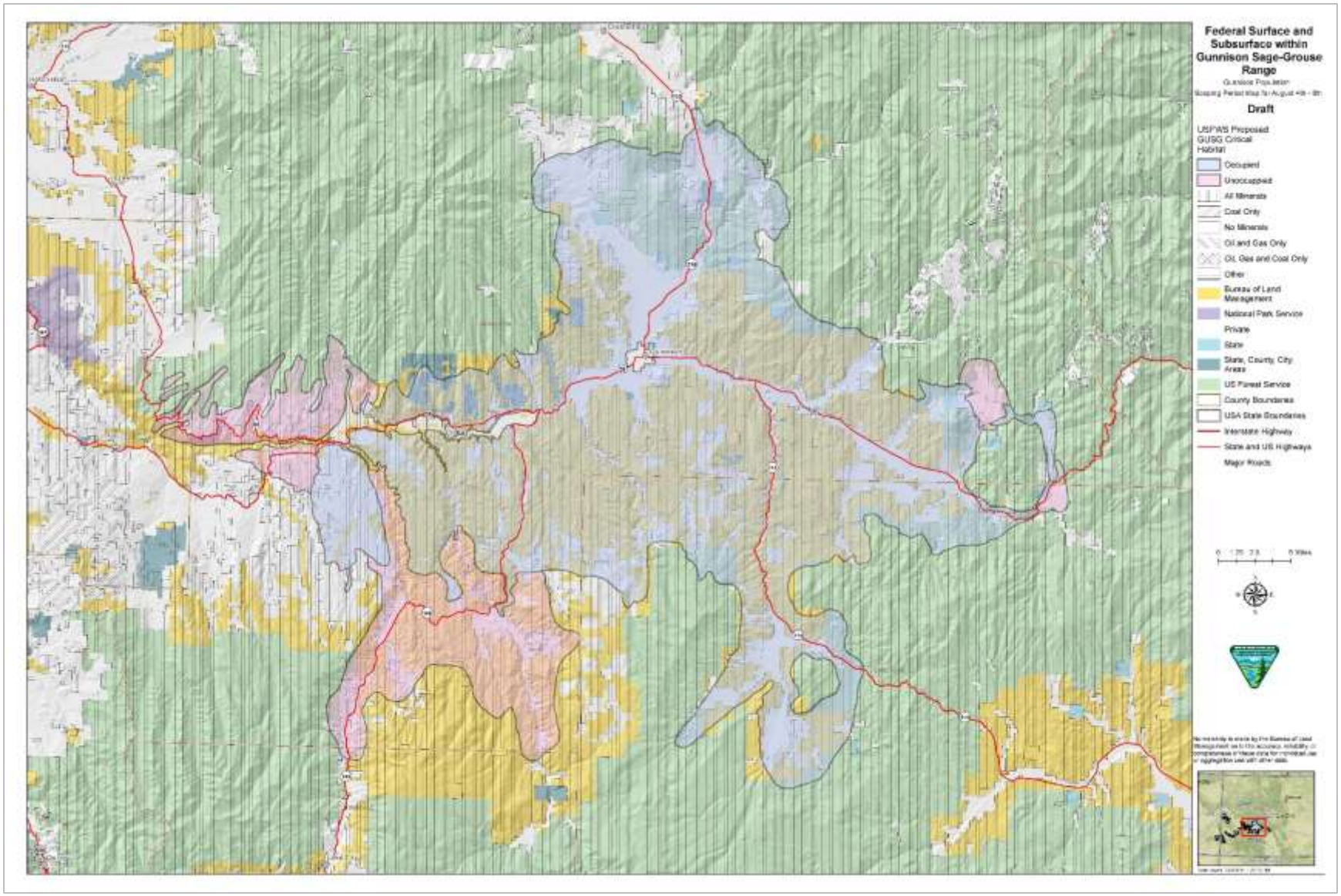


Figure 8 - Map of Federal Surface and Subsurface, Gunnison Population

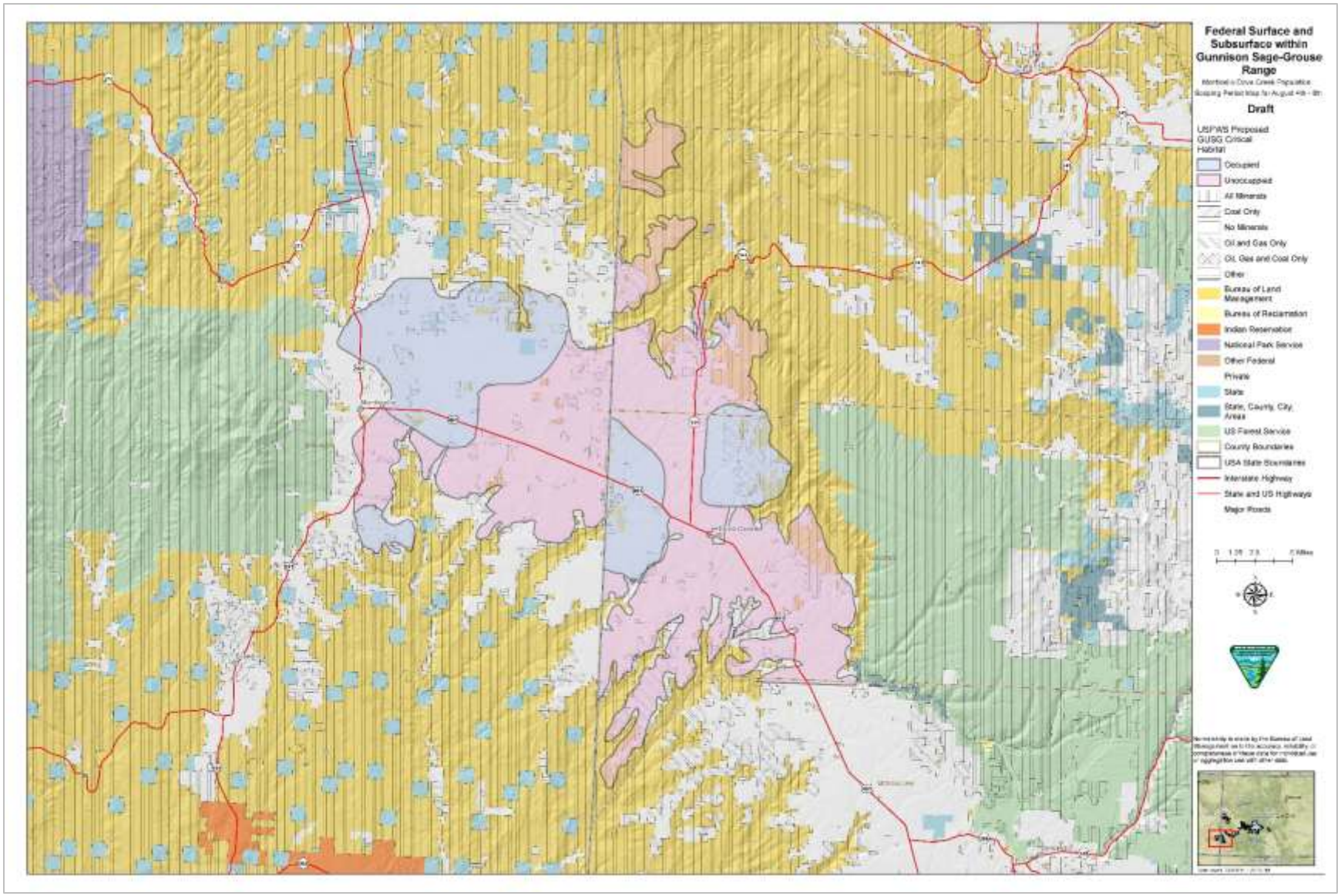


Figure 9 - Map of Federal Surface and Subsurface, Monticello/Dove Creek Population

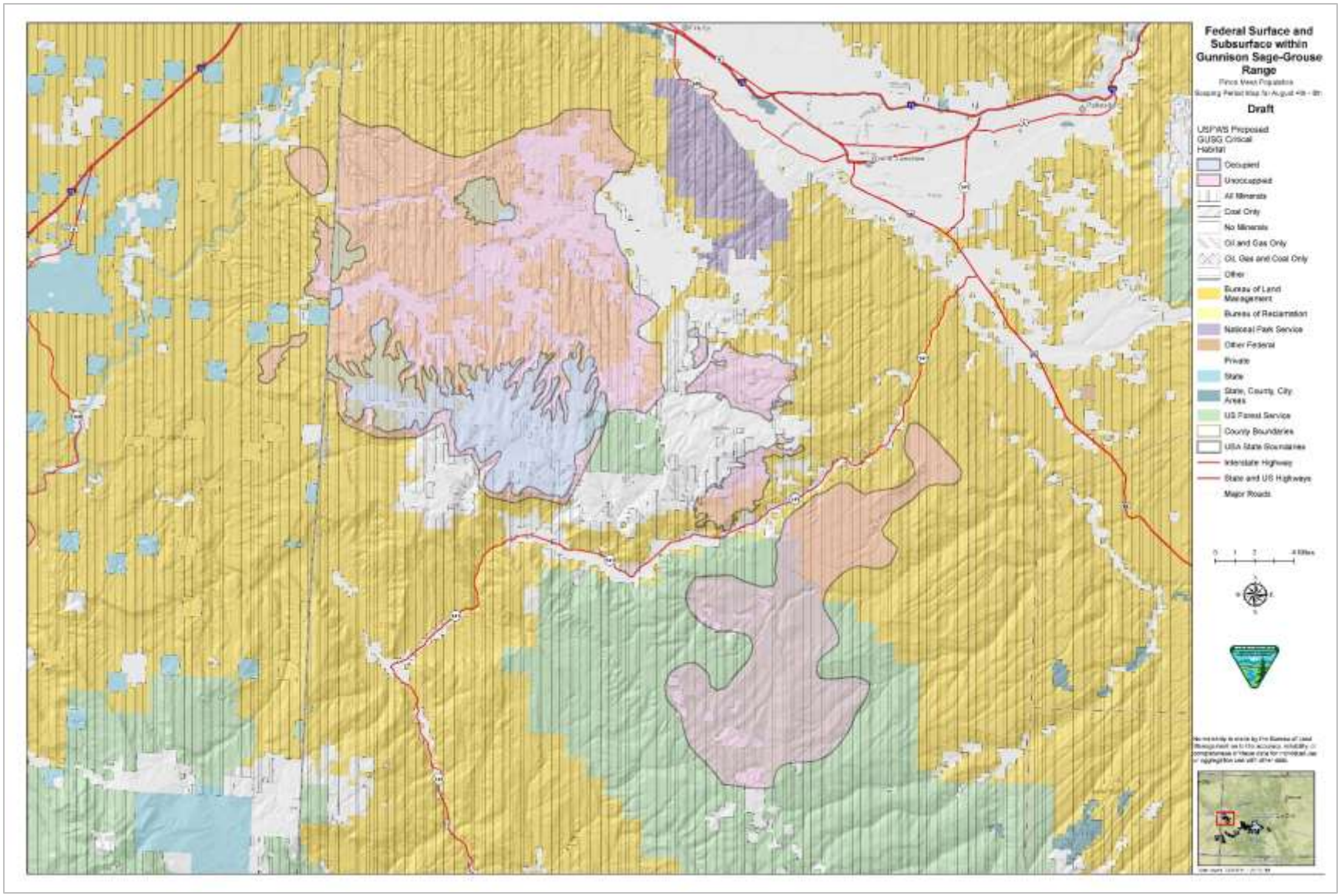


Figure 10 - Map of Federal Surface and Subsurface, Piñon Mesa Population

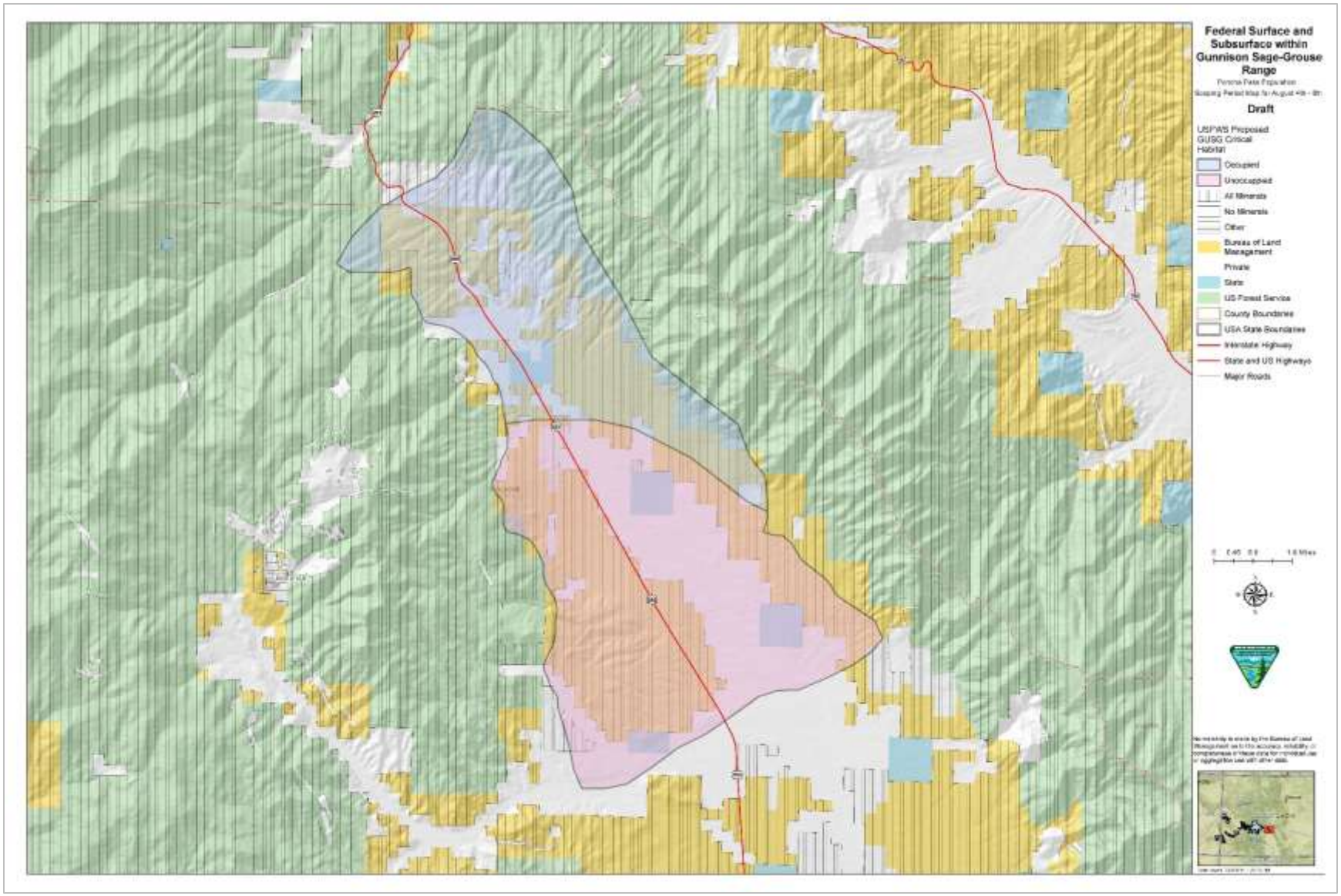


Figure 11 - Map of Federal Surface and Subsurface, Poncha Pass Population

Appendix F – Scoping Displays

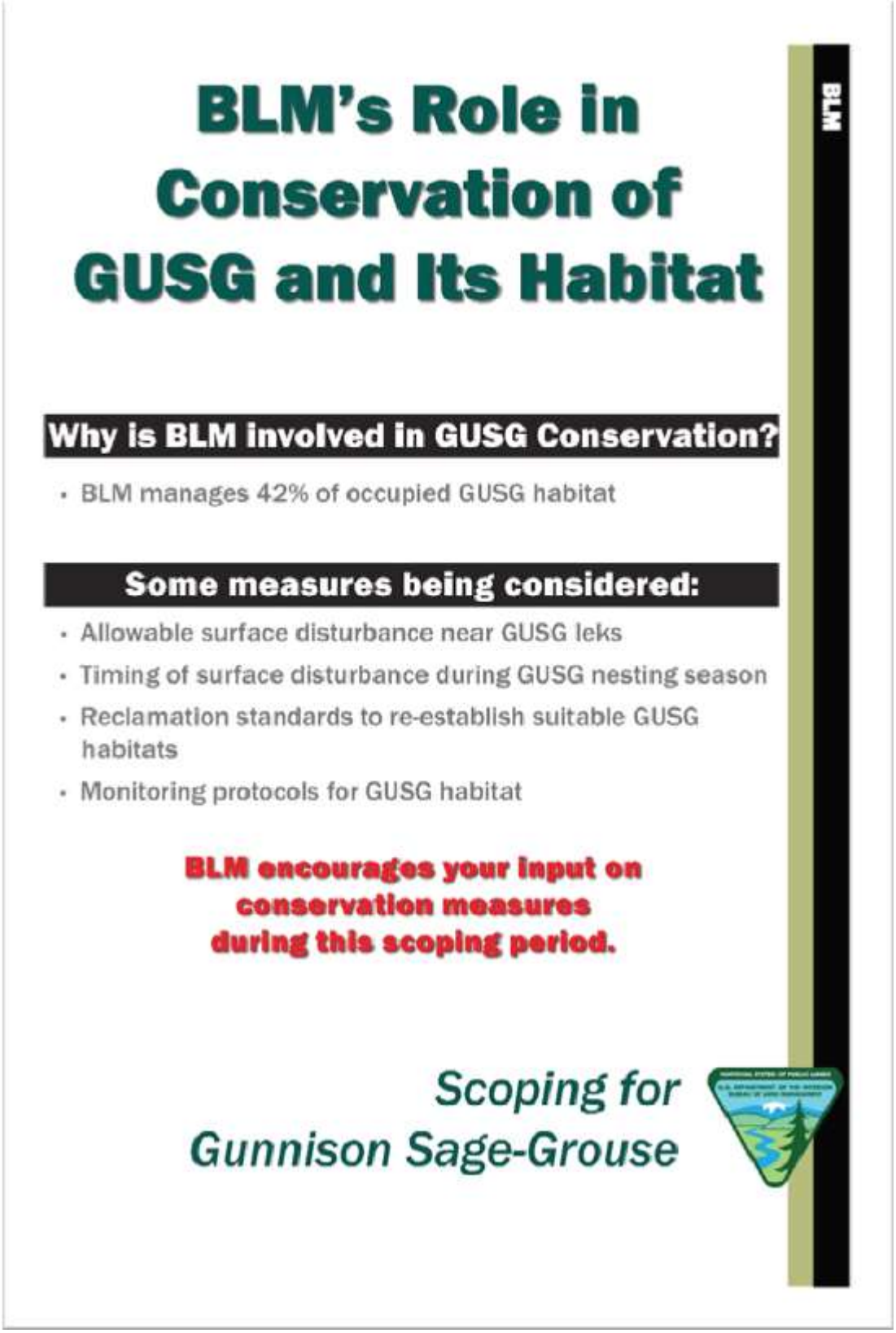


Figure 12 - Poster of BLM Role in GUSG and GUSG Habitat Conservation

BLM Field Offices that Manage GUSG Habitat and Counties in GUSG Habitat

BLM

The following BLM field offices will use the public input received during the scoping process to amend their current Resource Management Plans to conserve GUSG habitat in their regions. Ten counties in Colorado and two counties in Utah are located in GUSG habitat range.

BLM Field Offices	Counties in GUSG Habitat
Colorado	• Delta
• San Luis Valley Field Office	• Dolores
• Gunnison Field Office	• Gunnison
• Tres Rios Field Office	• Hinsdale
• Uncompahgre Field Office	• Mesa
• Canyons of the Ancients National Monument	• Montezuma
• Gunnison Gorge National Conservation Area	• Montrose
• Grand Junction Field Office	• Ouray
• McInnis Canyon National Conservation Area	• Saguache
	• San Miguel
Utah	• San Juan, Utah
• Moab Field Office	• Grand, Utah
• Monticello Field Office	

Scoping for Gunnison Sage-Grouse

Figure 13 - Poster of Counties and BLM Field Offices with GUSG or GUSG Habitat

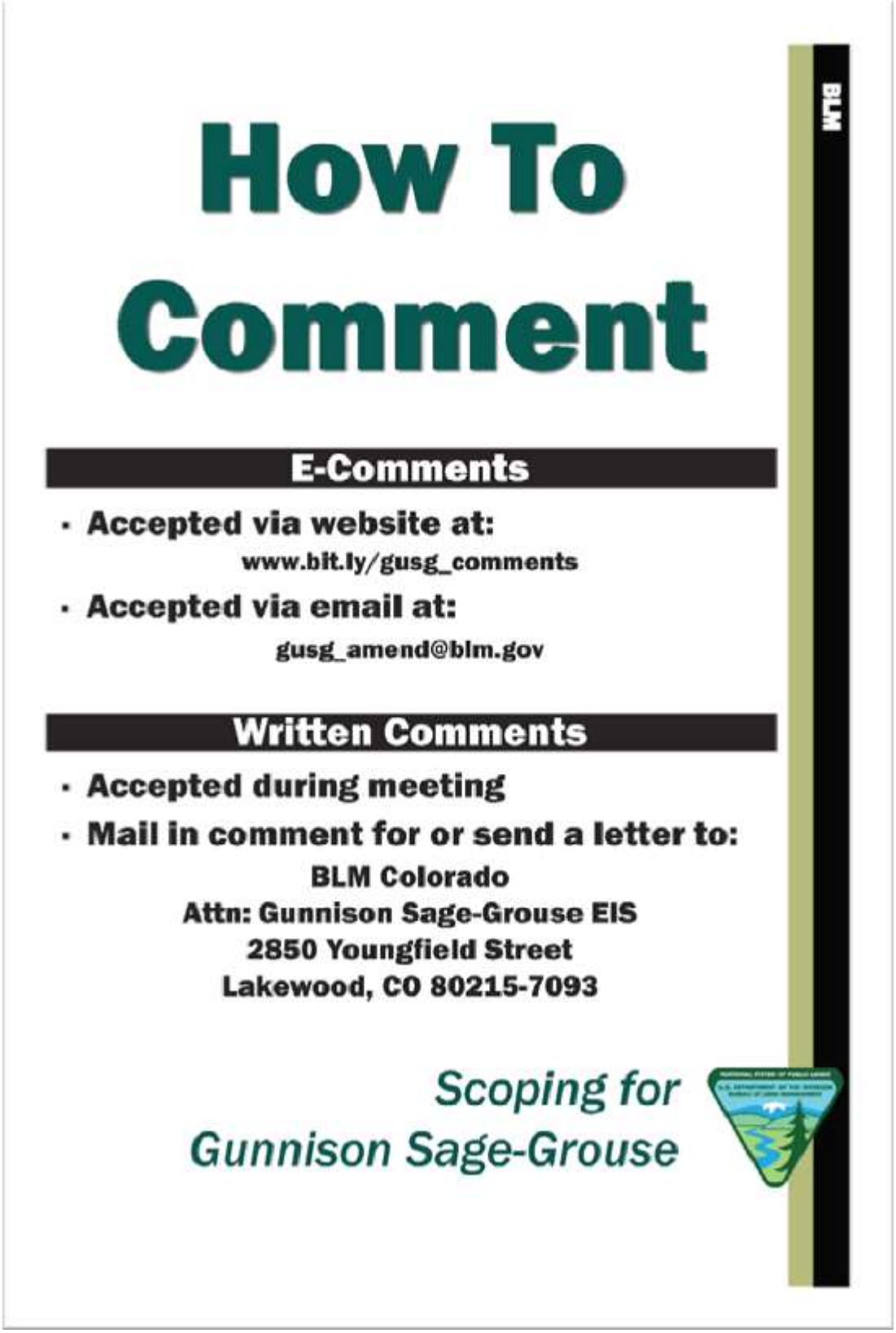


Figure 14 - Poster of Ways to Provide GUSG Scoping Comments

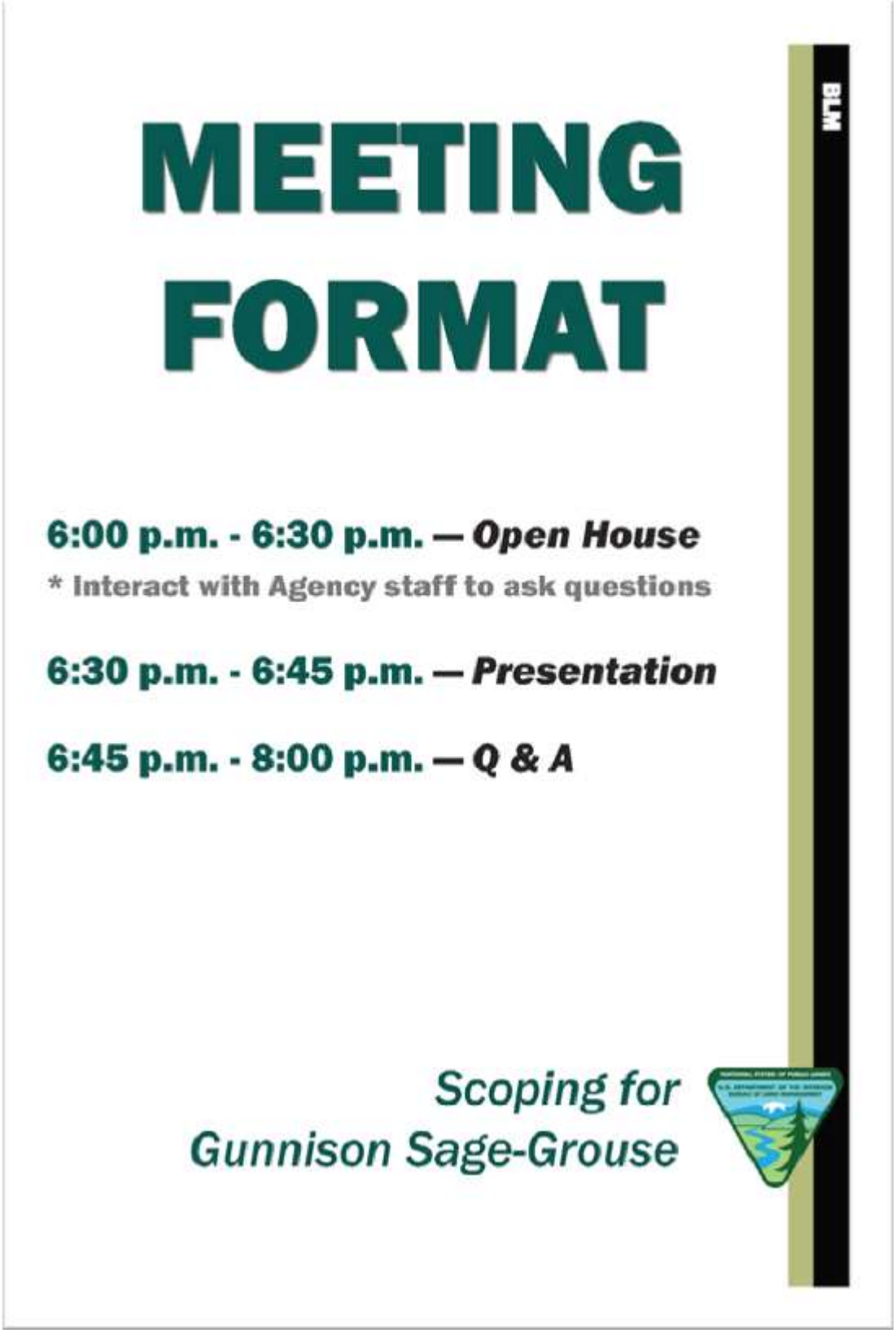


Figure 15 - Poster of GUSG Scoping Meeting Format

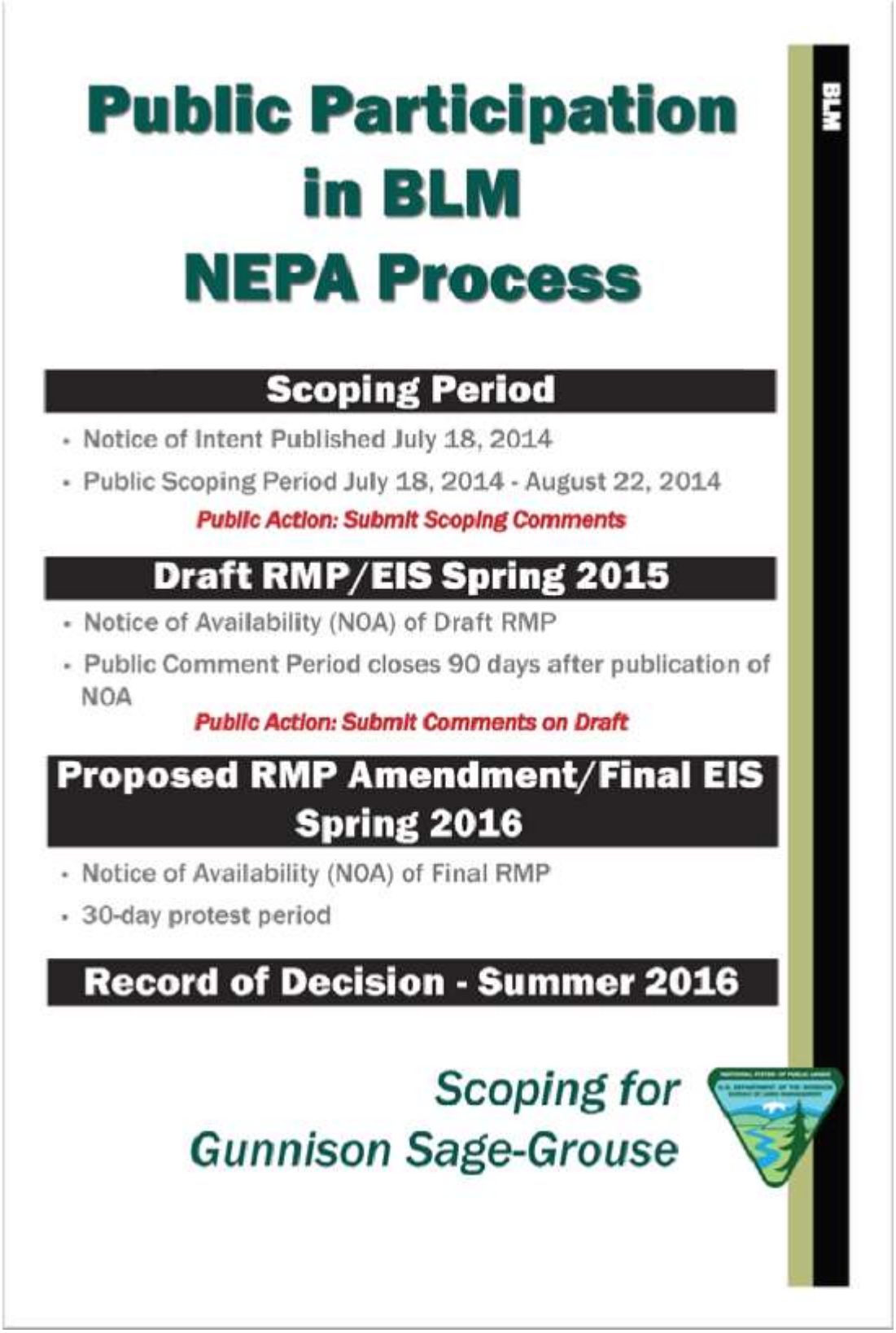


Figure 16 - Poster of Public Participation Opportunities

Figure 17 - Welcome Poster

Why This? Why Now?

BLM

- In its preliminary finding, the USFWS cited inadequacy of regulatory mechanisms for conserving GUSG and its habitat as a significant threat to the species survival.
- Whether GUSG is determined to be an endangered/ threatened species or not, BLM is considering additional conservation measures for better management of GUSG habitat.
- BLM is using a range-wide planning approach to evaluate and potentially adopt clear, consistent GUSG conservation measures across
  - 12 counties across Colorado and Utah
  - 11 BLM Resource Management Plans
- Scoping is part of the NEPA/EIS process when the public can contribute comments to BLM on issues regarding GUSG conservation and habitat management for the BLM to consider in its review and analysis.

Scoping for Gunnison Sage-Grouse

Figure 18 - Why This? Why Now? Poster

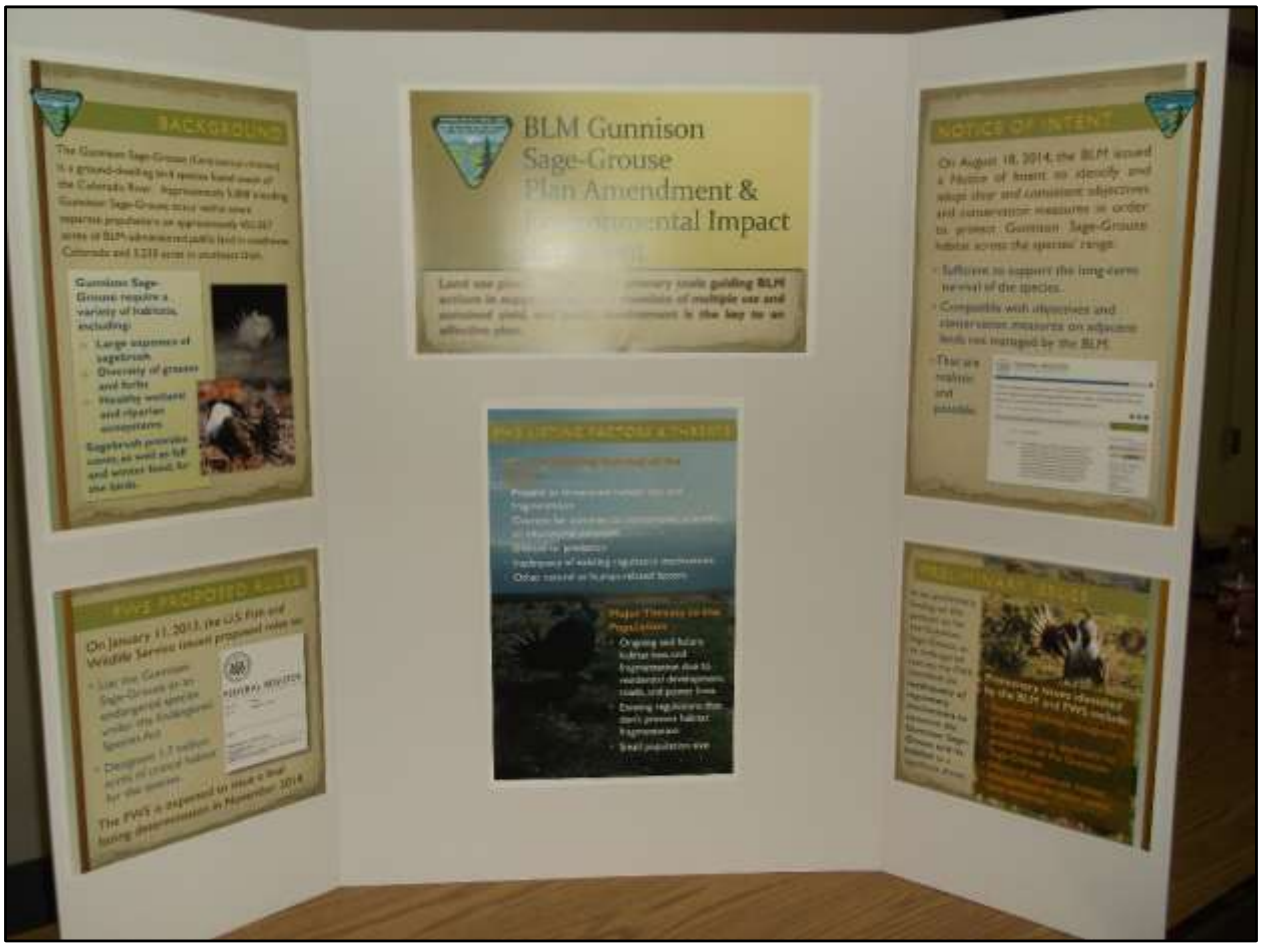


Figure 19 - Tri-fold Display with Project Background Information

Appendix G – Scoping PowerPoint

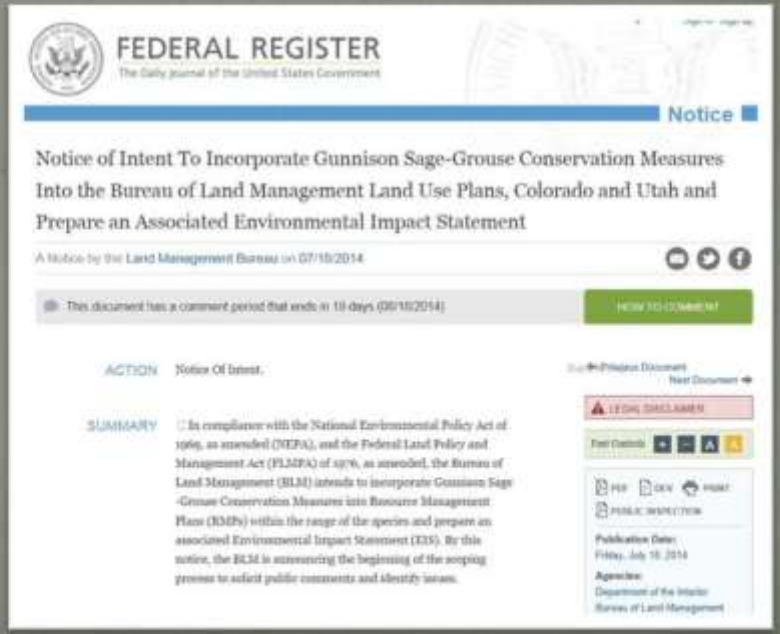
AUGUST 7, 2014
PUBLIC SCOPING
Dove Creek, Colorado
BUREAU OF LAND MANAGEMENT
GUNNISON SAGE-GROUSE
Range-wide Plan Amendment

FWS LISTING FACTORS & THREATS
Factors Affecting Survival of the Species
Present or threatened habitat loss and fragmentation
Overuse for commercial, recreational, scientific, or educational purposes
Disease or predation
Inadequacy of existing regulatory mechanisms
Other natural or human-related factors
Major Threats to the Population
Ongoing and future habitat loss and fragmentation due to residential development, roads, power lines
Existing regulations that don't prevent habitat fragmentation
Small population size

BLM NOTICE OF INTENT

On July 18, 2014, the BLM issued a Notice of Intent to identify and adopt clear and consistent objectives and conservation measures in order to protect Gunnison Sage-Grouse habitat across the species' range:

- Sufficient to support the long-term survival of the species.
- Compatible with objectives and conservation measures on adjacent lands not managed by the BLM.
- That are realistic and possible.


FEDERAL REGISTER
The Daily journal of the United States Government

Notice

Notice of Intent To Incorporate Gunnison Sage-Grouse Conservation Measures Into the Bureau of Land Management Land Use Plans, Colorado and Utah and Prepare an Associated Environmental Impact Statement

A Notice by the Land Management Bureau on 07/18/2014

This document has a comment period that ends in 18 days (08/18/2014)

HOW TO COMMENT

ACTION Notice Of Intent.

SUMMARY In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and the Federal Land Policy and Management Act (FLMPA) of 1976, as amended, the Bureau of Land Management (BLM) intends to incorporate Gunnison Sage-Grouse Conservation Measures into Resource Management Plans (RMPs) within the range of the species and prepare an associated Environmental Impact Statement (EIS). By this notice, the BLM is announcing the beginning of the scoping process to solicit public comments and identify issues.

Previous Document
Next Document

LEGAL DISCLAIMER

Text Controls

PDF DOCX PRINT
PUBLIC INSPECTION

Publication Date:
Friday, July 18, 2014

Agencies:
Department of the Interior
Bureau of Land Management

9/2/2014

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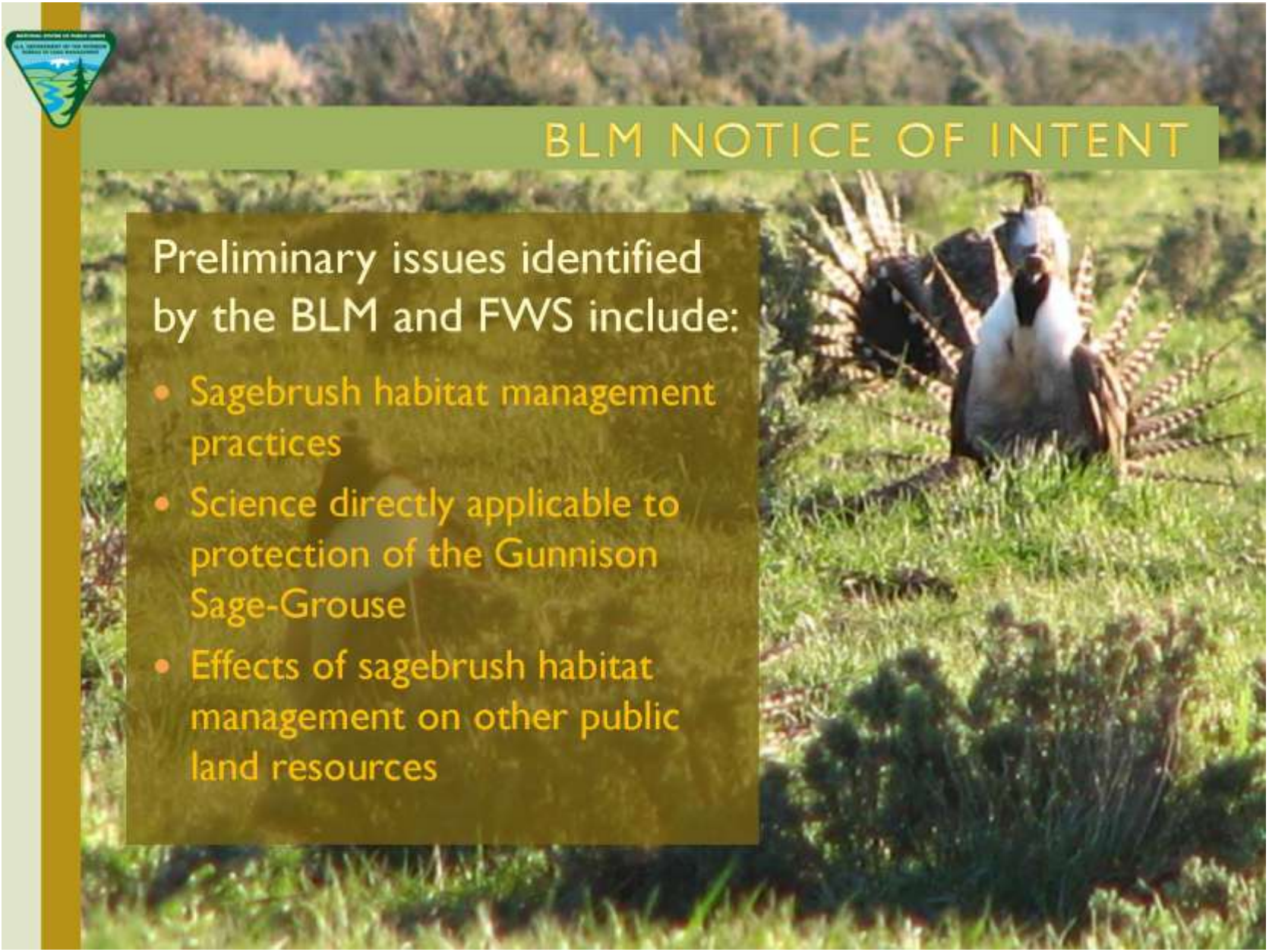

BLM NOTICE OF INTENT
Preliminary issues identified by the BLM and FWS include:
• Sagebrush habitat management practices
• Science directly applicable to protection of the Gunnison Sage-Grouse
• Effects of sagebrush habitat management on other public land resources

PUBLIC SCOPING

The BLM seeks the public's help...

- Early in a major planning effort
- To identify new and clarify existing information and issues for consideration in preparing to formulate the EIS
- To ensure that the BLM considers a full range of reasonable alternatives

...that results in an effective and widely supported plan.

BLM Gunnison Sage-Grouse Range-wide Land Use Plan Amendment
Public Scoping - July 18 through August 22, 2014

GOAL: To identify and adopt clear and consistent objectives and conservation measures to protect Gunnison Sage-Grouse habitat across the species' range

PUBLIC MEETINGS 6-8 PM
Information • Resource Specialists • Q&A Sessions

- Monday, August 4 - Denver Marriott West, 1717 Denver West Blvd, Golden, CO 80401
- Tuesday, August 5 - Fred R Field Western Heritage Center Multi-Purpose Building, 275 S Spruce St, Gunnison, CO 81230
- Wednesday, August 6 - Holiday Inn Express, 1391 S Townsend Ave, Montrose, CO 81401
- Thursday, August 7 - Dove Creek High School, 525 N Main St, Dove Creek, CO 81324

Concise written information and observations submitted by August 22 will help the BLM identify significant issues and formulate reasonable alternatives to be analyzed. Provide your input at meetings or by:

EMAIL: gsg_amend@blm.gov
FAX: 303.239.3699
USPS MAIL: BLM Colorado State Office, ATTN: Gunnison Sage-Grouse EIS, 2850 Youngfield Street, Lakewood, CO 80215

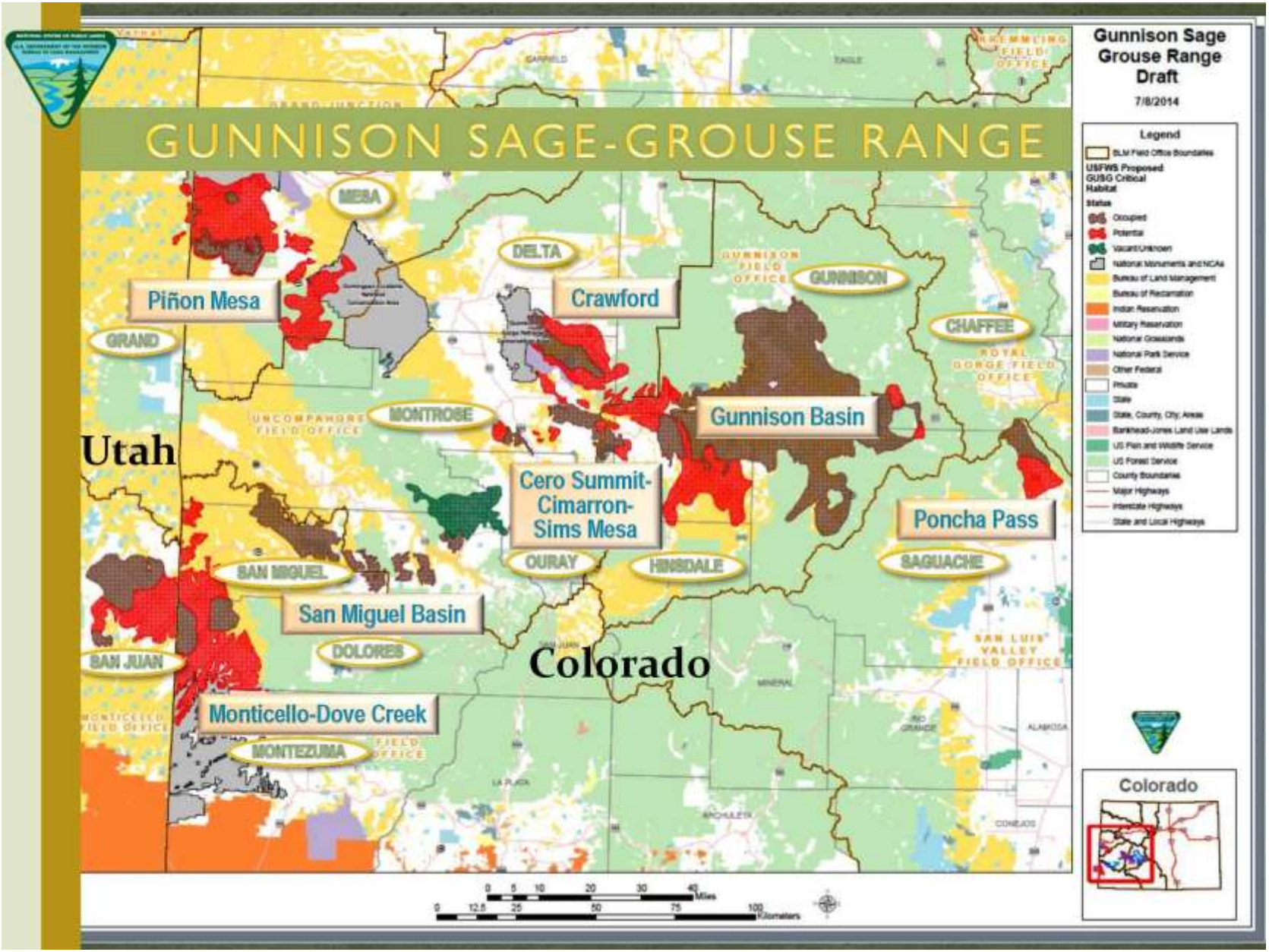
BLM Colorado State Office
ATTN: Gunnison Sage-Grouse EIS
2850 Youngfield Street
Lakewood, CO 80215

Information about the Gunnison Sage-Grouse Plan Amendment is available online at:
http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse/GUSG.html

9/2/2014 7

PUBLIC SCOPING
Issues identified by the public for addressing in the plan amendments will be evaluated by the BLM and placed into one of three categories:
1. Issues to be resolved in the plan
2. Issues to be resolved through policy or administrative action
3. Issues beyond the scope of this plan.
9/2/2014

BLM PLANNING PROCESS
✓Prepare to Plan
Write a Preparation Plan
✓Issue Notice of Intent to prepare EIS and begin scoping
Prepare Analysis of the Management Situation
documenting current conditions
Conduct Scoping
with minimum 30-day comment period and document results in a Scoping Report
WE ARE HERE
Formulate Alternatives
Analyze Effects of Alternatives
Select Preferred Alternative
Prepare Draft Plan/Draft EIS
Publish Notice of Availability
with 90-day comment period
Prepare Proposed Plan/Final EIS
Publish Notice of Availability
with 30-day protest period
Provide 60-day Governor's Consistency Review period
Prepare Approved Plan/ Record of Decision
Implement, Monitor and Evaluate Plan Decisions
The Gunnison Sage-Grouse Plan Amendment will conform to standard BLM land use planning processes.
9


GUNNISON SAGE-GROUSE RANGE
Gunnison Sage Grouse Range Draft
7/8/2014
Legend
BLM Field Office Boundaries
USFWS Proposed GUSG Critical Habitat
Status
Occupied
Potential
Vacant/Unknown
National Monuments and NCAs
Bureau of Land Management
Bureau of Reclamation
Indian Reservation
Military Reservation
National Grasslands
National Park Service
Other Federal
Private
State
State, County, City, Areas
Bankhead-Jones Land Use Lands
US Fish and Wildlife Service
US Forest Service
County Boundaries
Major Highways
Interstate Highways
State and Local Highways
Piñon Mesa
Crawford
Gunnison Basin
Cero Summit-Cimarron-Sims Mesa
Poncha Pass
San Miguel Basin
Monticello-Dove Creek
MESA
DELTA
GUNNISON
CHAFFEE
GRAND
MONTROSE
OURAY
HINSDALE
SAGUACHE
SAN MIGUEL
DOLORES
SAN JUAN
MONTEZUMA
Utah
Colorado
Colorado
Miles
Kilometers

BACKGROUND

The Gunnison Sage-Grouse *(Centrocercus minimus)* is a ground-dwelling bird species found south of the Colorado River. Approximately 5,000 breeding Gunnison Sage-Grouse occur within seven separate populations on approximately 455,557 acres of BLM-administered public land in southwest Colorado and 3,233 acres in southeast Utah.

Gunnison Sage-Grouse require a variety of habitats, including:

- large expanses of sagebrush
- a diversity of grasses and forbs
- healthy wetland and riparian ecosystems

Sagebrush provides both cover and fall and winter food for the birds.

10

COUNTIES IN PLANNING AREA
Colorado:
Chaffee
Delta
Dolores
Gunnison
Hinsdale
Mesa
Montrose
Ouray
Saguache
San Miguel
Utah:
Grand
San Juan
12

GUNNISON SAGE-GROUSE POPULATIONS
Monticello-Dove Creek
extends into southeast Utah
Piñon Mesa
San Miguel Basin
Cerro Summit-Cimarron-Sims Mesa
Crawford
Gunnison Basin
largest population (with approximately 4,000 birds)
Poncha Pass
9/2/2014
Gunnison Sage-Grouse Plan Amendment Scoping - DRAFT
13

CRITICAL HABITAT ACREAGE

MINERALS	HABITAT STATUS	ACRES
Habitat on BLM Surface		
	Occupied	399,344
	Unoccupied	226,636
	TOTAL	**625,981**
Habitat overlying Federal Sub-Surface Minerals		
All Minerals	Occupied	602,257
All Minerals	Unoccupied	377,328
Oil and Gas	Occupied	8,212
Oil and Gas	Unoccupied	17,727
Coal	Occupied	3,706
Oil, Gas, and Coal	Occupied	137
Other	Occupied	5,546
Other	Unoccupied	9,494
	TOTAL	**1,024,461**

9/2/2014 **Acreages approximate from BLM GIS Data - 6/23/2014 14

AGREEMENTS & POLICIES

The plan amendment will be formulated in close coordination with BLM policies and partnership agreements, including:

- BLM Policies
  - CO-IM-2013-033 (2013)
  - WO-IM-2014-100 (2014)
- Partnership Agreements
  - *Rangewide Conservation Plan* (2005)
  - *Candidate Conservation Agreement with Assurances* (2006)
  - *Gunnison Basin Candidate Conservation Agreement* (2013)

9/2/2014

15

PLAN AMENDMENTS

BLM resource management plans (RMPs) potentially affected:

COLORADO PLANS

- San Luis RMP (1991)
- Gunnison RMP (1993)
- San Juan/San Miguel RMP (1985)
  Currently under revision in Tres Rios and Uncompahgre RMPs
- Uncompahgre Basin RMP (1989)
  Currently under revision in Dominguez-Escalante National Conservation Area (NCA) and Uncompahgre RMPs

9/2/2014 Gunnison Sage-Grouse Plan Amendment Scoping - DRAFT 16

PLAN AMENDMENTS

COLORADO PLANS (continued)

- Grand Junction RMP (1987)
  Currently under revision in Grand Junction and Dominguez-Escalante NCA RMPs
- Gunnison Gorge NCA RMP (2004)
- Canyons of the Ancients National Monument RMP (2010)

UTAH PLANS

- Moab RMP (2008)
- Monticello RMP (2008)

9/2/2014 Gunnison Sage-Grouse Plan Amendment Scoping - DRAFT 17

RESOURCES & PROGRAM AREAS
The BLM will use an interdisciplinary approach to develop the plan amendments in order to consider the full range of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the process:
Grazing
Invasive Species
Land Tenure
Recreation
Rights-of-Way
Minerals Development
Oil and Gas
Coal
Other
Fire Prevention and Suppression
Travel Management
18

OPPORTUNITIES TO PARTICIPATE
Comment Periods
Scoping & Draft
Public meetings
Resource Advisory Council meetings
Protest Period
9/2/2014
20

PROVIDING COMMENTS

WHERE?

- **Hand Deliver:** At Scoping Meetings
- **Online:** www.bit.ly/gusg_comments
- **Email:** GUSG_AMEND@BLM.GOV
- **U.S. Mail:** GUSG Amendment
  BLM Colorado State Office
  2850 Youngfield St
  Lakewood, CO 80215
- **FAX:** (303) 239-3699

9/2/2014 21

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

PROVIDING COMMENTS

BLM

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BLM > Colorado > Programs > Sage-grouse > Gunnison Sage-Grouse

Print Page

GUNNISON SAGE-GROUSE CONSERVATION MEASURES

In accordance with the National Environmental Policy Act (NEPA), the BLM is preparing an Environmental Impact Statement (EIS) and associated amendment to adopt consistent objectives and conservation measures in order to protect Gunnison Sage-Grouse habitat across the species' range. The EIS is slated for completion by July 2016.

The range-wide planning area will consist of more than 625,000 acres of BLM surface estate in Chaffee, Delta, Dolores, Gunnison, Hinsdale, Mesa, Montrose, Ouray, Saguache, and San Miguel counties in Colorado and Grand and San Juan counties in Utah. BLM Colorado will lead the effort to evaluate existing and potential measures for protecting occupied and potential Gunnison Sage-Grouse critical habitat on behalf of BLM Colorado and BLM Utah. These conservation measures will be incorporated into applicable BLM land use plans.

BACKGROUND

The Gunnison Sage-Grouse *(Centrocercus minimus)* is a ground-dwelling bird requiring large expanses of sagebrush, along with a diversity of grasses

COMMENT HERE

PUBLIC SCOPING
July 18 - August 22

Federal Register Notice of Intent

DOCUMENTS & RESOURCES

ePlanning - Check this site frequently for opportunities to comment

BLM Washington Office IM 2014-100 - Interim Measures

Fish and Wildlife Service Fact Sheet

Gunnison Basin Candidate Conservation Agreement

Critical Habitat Acreage Table

ADDITIONAL INFORMATION
For current information on efforts to conserve the Gunnison Sage-Grouse and its critical habitat, visit:
BLM GUSG Plan Amendment
www.bit.ly/gunnison_sage-grouse
FWS GUSG Information and Process
www.fws.gov/mountain-prairie/species/birds/gunnisonsagegrouse/
9/2/2014
23

THE END

Appendix H – Scoping Handouts

Frequently Asked Questions

Gunnison Sage-Grouse Range-Wide Amendment and EIS Scoping Meetings

1. What is the Gunnison Sage-Grouse?

The Gunnison Sage-Grouse *(GUSG)* is a species of sage-grouse found south of the Colorado River in Colorado and Utah. GUSG require a variety of habitats including large expanses of sagebrush with a diversity of grasses and forbs as well as healthy wetland and riparian ecosystems. They require sagebrush for cover as well as fall and winter food.

Approximately 5,000 breeding GUSG occur among seven separate populations in southwest Colorado and southeast Utah. The largest population—about 4,000 birds—inhabits the Gunnison Basin. According to the U.S. Fish and Wildlife Service (USFWS), the population trends over the last 12 years indicate that the six smaller populations are in decline and the Gunnison Basin population trend has been stable. Primary threats to GUSG populations include loss or fragmentation of habitat; lack of habitat connectivity between populations; invasive weeds; small populations; and the potential for disease, fire, or development on GUSG habitat.

On January 11, 2013, the USFWS proposed to protect GUSG as an endangered species under the Endangered Species Act and to designate 1.7 million acres of critical habitat for the species. The USFWS is scheduled to make the final decision on whether to list GUSG for protection under the Endangered Species Act in November 2014.

2. Why is the BLM involved in GUSG conservation?

The BLM manages for the multiple use and sustained yield of our public lands, looking to strike a balance in managing diverse and often conflicting interests. Because the BLM is responsible for managing land and resources that comprise 42 percent of proposed critical occupied GUSG habitat, our role as a land management agency is essential to the conservation of its habitat and in helping the species thrive.

3. How does the BLM currently manage for GUSG conservation?

The BLM's policy is to manage GUSG seasonal habitats and maintain habitat connectivity to support sustainable GUSG populations and population objectives determined in coordination with Colorado Parks and Wildlife, the Utah Division of Wildlife Resources, and the USFWS. The BLM has implemented conservation measures for GUSG habitat since the species was recognized as a separate species in 2000. For example:

- In April 2005, BLM Colorado joined in signing the Range-Wide Gunnison Sage-Grouse Conservation Plan, developed by an interagency team led by Colorado Parks and Wildlife. The plan provides extensive guidance for management of the species by population and on a range-wide basis to address conservation issues and maintenance of local populations.
- In summer 2013, BLM Colorado signed a Candidate Conservation Agreement (CCA) for Gunnison Sage-Grouse on federally-managed lands in the Gunnison Basin. Other signatories to the CCA include USFWS, National Park Service, U.S. Forest Service, the Natural Resources Conservation Service, Colorado Parks and Wildlife, and Gunnison and Saguache counties.

Figure 20 - Handout of Frequently Asked Questions Regarding the Plan Amendment/EIS

- In May 2014, the BLM issued an Instruction Memorandum (IM) guiding management of proposed occupied critical GUSG habitat on BLM lands. This IM builds on existing protections for GUSG habitat that have been established through BLM policy as well as partnerships with state, local, private, and federal agencies.

4. How is the BLM updating its conservation planning approach for GUSG?

The USFWS has determined that due to the inadequacy of current regulatory mechanisms meant to conserve GUSG and its habitat, additional conservation measures to protect GUSG habitat should be adopted in BLM Resource Management Plans (RMPs), the BLM's primary resource management tool. There are 11 RMPs that could be amended to incorporate new or enhanced GUSG conservation measures within proposed critical GUSG habitat. The BLM intends to conduct a range-wide plan amendment and Environmental Impact Statement (EIS) to evaluate the adequacy of existing GUSG conservation measures in these RMPs and consider additional conservation measures, as appropriate, to be included in the RMPs.

5. Why is an EIS needed?

Because of the size and scope of the range-wide amendment plan, the National Environmental Policy Act requires that an EIS be completed to evaluate and publicly disclose the environmental and socioeconomic consequences of the proposed changes. The EIS analysis area includes more than 1.7 million acres of proposed critical occupied and unoccupied habitat within federal, state, city, county, and private lands in Colorado and Utah. Approximately 800,000 acres of this area will be affected by the EIS, including about 600,000 acres of BLM-managed surface area and more than 200,000 acres of split estate. The EIS process provides multiple opportunities for input from the public to identify land use concerns related to GUSG conservation and to review the proposed changes and potential consequences.

6. What is the BLM's schedule for completing the EIS and associated amendment?

Given the interim status of current BLM land management policies related to GUSG habitat, it is important to get the EIS completed and any resulting amendment in place as quickly as possible while allowing for sufficient public input and review. The proposed schedule for the EIS and associated amendment is:

Action	Date
Notice of Intent Published in Federal Register	July 18, 2014
30-Day Scoping Period	July 18, 2014, to August 22, 2014
90-Day Draft EIS Public Comment Periods	Spring 2015
Publish Final EIS & Proposed RMP Amendment	Spring 2016
Issue Record of Decision & Approved Resource Management Plan Amendment	Summer 2016

7. How would the BLM's planning changes affect management of my private land?

The BLM's planning changes would not affect management of your private land. If the BLM is your neighbor, changes to management of that land could indirectly affect you by changing current land management practices near you.

8. How would the BLM's planning changes affect management of my private surface with federal minerals below (split estate)?

The BLM does not manage private property. However, conservation measures to include split estate lands and federal minerals may be implemented in the future. New leases and permits for development of BLM-managed subsurface estate would be subject to any conservation measures added to the RMPs when the lease or permit is granted by the BLM.

9. Will the EIS address impacts to GUSG from predation?

Although the effect of predation on GUSG population trends is uncertain, USFWS identified predation as a threat. Existing and continued landscape fragmentation will likely increase the effects of predation on this species, particularly in the six smaller populations. Since the management of wildlife species lies in the hands of state agencies, BLM will focus its efforts on maintaining and improving habitat quality to reduce impacts of fragmentation and predation.

A detailed discussion of the factors affecting GUSG populations and associated conservation measures by the Gunnison sage-grouse Working Group can be found at the following website: **http://www.blm.gov/co/st/en/fo/gfo/sage_grouse.html.**

10. Is Greater Sage-Grouse conservation part of this effort?

No. GUSG was recognized as a species separate from the Greater Sage-Grouse in 2000. The status of the Greater Sage-Grouse is also being considered by USFWS for protection under the Endangered Species Act and is on similar timetable for determination as an endangered species. The BLM has undertaken a separate effort to incorporate conservation actions for the Greater Sage-Grouse in RMPs for the five BLM field offices in northwest Colorado. Details regarding BLM Colorado's planning changes for the Greater Sage-Grouse can be found on this website: **http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse/0.html.**

Frequently Asked Questions

Gunnison Sage-Grouse Range-Wide Amendment and EIS Scoping Meetings

1. What is the public scoping period?

The Bureau of Land Management (BLM) just published a Notice of Intent (NOI) to incorporate Gunnison Sage-Grouse conservation measures into Resource Management Plans (RMPs) within the range of the species and prepare an associated Environmental Impact Statement (EIS). However, before we begin writing the EIS, we want to identify issues you want the BLM to consider as we complete this effort. We do this through the scoping period, which is an open public comment period that precedes any BLM planning process. Your input during this phase will ensure we understand the issues the public would like the EIS to address.

2. What is the point of these public meetings?

The four public meetings we are holding are part of the public scoping period for the Gunnison Sage-Grouse EIS. They are meant to provide an in-person, face-to-face format for communication between the BLM and the public. During the scoping meetings, we will be explaining the EIS process and the intent of the EIS as well as responding to questions about the process. These meetings are a time for you to learn more about the process and identify the issues you would like to be analyzed in the Gunnison Sage-Grouse EIS. Please be aware that for a comment to be admitted into the public scoping record, it must be submitted in writing. Comment forms are available at each public meeting.

3. How can I submit my comment?

The preferred and easiest way to comment is through the comment form on our ePlanning webpage. You can access this site here: **http://bit.ly/gusg_comments**. You can also email us at **gusg_amend@blm.gov**, fax us at (303) 239-3699, or send comments by mail to:

BLM Colorado State Office
Attn: Gunnison Sage-Grouse EIS
2850 Youngfield St.
Lakewood, CO 80215-7093

4. How can my comments be most effective?

Substantive comments, rather than broad statements, are most effective. Substantive comments focus on specific issues and are intended to aid in determining the scope of issues to be addressed and for identifying the significant issues. For example, substantive comments may:

- Identify additional planning criteria.
- Identify reasonable alternatives.
- Recommend specific changes to landscape or management actions.
- Highlight information the BLM may use when developing alternatives and considering their impact.

Figure 21 - Handout of Frequently Asked Questions Regarding Public Scoping

- Raise concerns regarding resources or use of public lands within the planning area with specific and relevant reasoning.

Try to avoid submitting comments that:

- Offer only your opinion.
- Favor or oppose an action or BLM policy without providing justification as to why.
- Lack a citation or supporting data if your comment references data.
- Do not pertain to the planning area being considered (southwest Colorado and southeast Utah) or Gunnison Sage-Grouse conservation measures.
- Are constructed as vague, open-ended questions rather than clear statements.

As you construct your comments, consider:

- How will the BLM be able to incorporate these recommendations into its Gunnison Sage-Grouse Environmental Impact Statement?
- How would incorporating this comment affect Gunnison Sage-Grouse and other land uses in Colorado and Utah?

You may want to read the NOI to gain a better idea of what the BLM intends to do, so you can tailor your comments accordingly. You can find the NOI here: **http://bit.ly/sage-grouse_noi**.

How to Comment

Gunnison Sage-Grouse Range-Wide Amendment and EIS Scoping Meetings

Please note: Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

E-Comments

- Accepted via website at: **www.bit.ly/gusg_comments**
- Accepted via email at: **gusg_amend@blm.gov**

Written Comments

- Accepted during meeting
- Via fax to: (303) 239-3699
- Mail in comment form or send a letter to:

BLM Colorado
ATTN: Gunnison Sage-Grouse EIS
2850 Youngfield Street
Lakewood, CO 80215-7093

Figure 22 - Handout providing information on How to Comment

Comment Form

Gunnison Sage-Grouse Range-Wide Amendment and EIS Scoping Meetings

Name: _____
Organization/Title: _____
Email Address: _____

If any handwritten text is illegible, we would like the opportunity to contact you to ensure we accurately capture your comments, concerns, and suggestions.

Phone Number: _____
Best Time to Call: _____

Your Comments

Figure 23 - Scoping Comment Form

The Public Scoping period for the identification of conservation measures to protect the Gunnison Sage-Grouse on federally managed lands in Colorado and Utah will extend through August 22, 2014. Written comments should be postmarked no later than that date and be sent to the address below. You may fax this form to (303) 239-3699 or email to **gusg_amend@blm.gov** . Please add additional pages if necessary. The preferred and easiest way to comment is through the comment form on our ePlanning webpage. You can access this site here: **http://bit.ly/gusg_comments**.

Thank you for your comments!

Place
Postage
Here

BLM Colorado
Attn: Gunnison Sage-Grouse EIS
2850 Youngfield Street
Lakewood, CO 80215-7093

Appendix I – Scoping Meeting Records

TECHNICAL MEMORANDUM

DATE: August 18, 2014
TO: Leigh Espy, BLM Project Manager for GUSG Plan Amendment
SUBJECT: Meeting Record, GUSG Public Scoping Meeting, Denver, Colorado

Date, Time, and Location: August 4, 2014 at 6:00 p.m. at the Denver Marriott West Conference Center. This technical memorandum summarizes the information associated with the public scoping meeting conducted in Denver, CO on August 4, 2014 for the Gunnison Sage-Grouse (GUSG) Range-Wide Amendment and EIS Project.

Attachment A contains the list of attendees and Attachment B contains photographs taken during the scoping meeting.

In general, the agenda for the meeting followed the approximate timeline below:

- 6:00 p.m. – 6:30 p.m. Open House
  The public had an opportunity to talk to BLM representatives one on one and review maps and information posters.
- 6:30 p.m. – 6:45 p.m. Presentation
  Leigh Espy—BLM Project Manager—gave a presentation.
- 6:46 p.m. – 8:00 p.m. Question and Answer Session
  The public was provided an opportunity to ask BLM questions about the project.

Questions at the Denver meeting generally fell into the following categories:

Questions Related to the Process (including timeframe, scope of process, and specificity of comments)

- Is this proposed schedule adequate time for BLM to analyze/conduct NEPA?
- How will the BLM plan amendment be affected if the USFWS does not list GUSG as endangered?
- Will the new/forthcoming Tres Rios plan need to have an amendment with updated/new measures from this effort?
- Do you want scoping comments to be specific? For example, the types of Colorado Parks and Wildlife predator control that should be done or not done in GUSG habitat? Is raven control a bad idea, or is raccoon control pointless? Or should the comments be more general in nature?

- How can public provide input without knowing more details? The August 22, 2014 scoping comment period deadline does not give the public much time.

Questions related to the Scope of Alternatives (including the BLM authority space, availability of information and science, and how the alternatives may vary)

- How much flexibility does the BLM have in this amendment to limit mining activities?
- Does the BLM have the authority to mitigate activities such as wind or solar projects?
- Will measures be consistent across the GUSG habitat range or might they vary based on the differences among the sub-populations?
- Will the alternatives consider creating sagebrush reserves to create additional GUSG habitat?
- Are there Master Leasing Plans being developed in GUSG habitat areas, and if so, will those plans include the GUSG conservation measures or be amended to include it?
- What will the BLM do if there is a lack of data related to GUSG, can the BLM still conduct this analysis and plan amendment?
- If there is a lack of science on GUSG habitat, will the BLM use Greater Sage-Grouse science?
- Does the BLM have enough current condition data related to existing infrastructure (fences and roads) in areas of critical habitat?
- If there is no data or science available, will the BLM be more or less conservative in their planning process?
- Philosophically, how does the BLM balance needs of the bird with the needs of the people?

Other Questions

- Can the BLM provide examples of non-governmental organizations that are partnering with or consulting with BLM on this amendment?
- How will the conservation measures applied on BLM land affect adjacent property? Will it prevent me from building on my land?

TECHNICAL MEMORANDUM

DATE: August 25, 2014
TO: Leigh Espy, BLM Project Manager for GUSG Plan Amendment
SUBJECT: Meeting Record, GUSG Public Scoping Meeting, Gunnison, Colorado

Date, Time, and Location: August 5, 2014 at 6:00 p.m. at the Fred R. Field Western Heritage Center Multi-Purpose Building in Gunnison, CO. This technical memorandum summarizes the information associated with the public scoping meeting conducted in Gunnison, CO on August 5, 2014 for the Gunnison Sage-Grouse (GUSG) Range-Wide Amendment and EIS Project.

Attachment A contains the list of attendees and Attachment B contains photographs taken during the scoping meeting.

In general, the agenda for the meeting followed the approximate timeline below:

- 6:00 p.m. — 6:30 p.m. Open House
  The public had an opportunity to talk to BLM representatives one on one and review maps and information posters.
- 6:30 p.m.— 6:35 p.m. Brief Introductory Comments
  Jonathan Hoach, Gunnison County Commissioner
- 6:35 p.m. — 6:55 p.m.Presentation
  Leigh Espy, BLM Project Manager, gave a presentation.
- 6:55 p.m.— 8:00 p.m. Question and Answer Session
  The public was provided an opportunity to ask BLM questions about the project.

Questions at the Gunnison meeting generally fell into the following categories:

Questions/Comments Related to the Process (including relationship to other to other documents, the FWS process, and timeframe)

- How will this Range-Wide Amendment interact with the Candidate Conservation Agreement (CCA) BLM signed last year?
- Will the individual RMP amendments include the conservation measures/direction that is in the Range-Wide Conservation Plan (RCP) developed for GUSG?
- How will changes be made to the plan amendment after it is completed and adopted? Will the BLM go back to the public to discuss any new changes, or will changes be made internally by the BLM?

- How will the FWS be involved in the BLM Amendment process? They may be responsible for the species listing, but the critical habitat polygons include massive acreage that is managed by the BLM. Seems like there needs to be interagency cooperation; the public seems stuck in the middle.
- How much is this EIS process going to cost? Why is the BLM spending money now on a Range-Wide amendment?
- Is it possible for the BLM to do this Amendment or even issue a Draft EIS prior to the FWS listing decision? Should the BLM reconsider spending time and money on an Amendment until after FWS issues their decision?
- Will the conservation measures by the BLM for GUSG be removed if the species is not listed or is eventually de-listed? I'm concerned that once the Plan is written, the measures will never go away, even when conditions improve for GUSG.
- I am a landowner with a business in the middle of GUSG critical habitat. We have been involved and proactive in changing our business hours and practices to minimize disturbance and accommodate the GUSG. However, none of our actions have been done through formal agreements. I am concerned that my business could be shut down or changed if BLM does not know or have a formal acknowledgement of everything we've done. How do we make the BLM aware of our efforts? Do I talk to the local Gunnison Field Office or to the State BLM?
- Is the BLM trying to avoid listing?
- Why is there a need for this Amendment, now? It seems pre-mature, especially considering that the Gunnison Field Office is already implementing conservation measures that are outside of the existing RMP direction for GUSG.
- Gunnison County Commissioner, Paula, commented that the Commissioners were participating as a Cooperating Agency in the BLM process to make sure that the work already done through the CCAA and interests of the County is considered in the Amendment process.
- The August 22, 2014 deadline for submitting public scoping comments is not enough time for the City of Gunnison to respond; i.e., the timeframe doesn't fit with our scheduled meeting times or provide enough time to schedule a special meeting.

Questions/Comment related to the Analysis and Range of Alternatives

- Will the plan be a blanket, one-size-fits-all for the whole planning area/species range? And if so, will that be effective for the satellite populations?
- With regard to a slide in the presentation, why wasn't wildlife listed in the resources that would be analyzed in the process?

- Shared lessons learned from the Colorado Cattlemen's Association; in particular two key concepts that the BLM should focus on in their process—"adaptive management" and "interim science," i.e., that conditions and science continuously change and evolve, and as it does, the better information and knowledge should be recognized and used.

Questions Related to the Analysis and Science (including management direction for the Basin population versus the Satellite populations)

- Gunnison residents are concerned about land use changes that might result from the BLM GUSG Plan Amendment. Particularly, there is concern that the Amendment will not honor the existing work and agreements that are currently working and successful for the GUSG in the Basin. How will BLM ensure efforts to date are not lost?
- Being that 80 percent of the GUSG are in the Basin, I am concerned that the other 20 percent (i.e., satellite populations) will influence management direction in the Amendment and change what is working in Gunnison for the Basin population.
- Will you be using GUSG-specific science, or will you also be considering Greater Sage-Grouse science?

Questions to be addressed by the USFWS

- What percentage of species proposed for listing by the FWS eventually get listed?
- What is population size goal for each habitat area?
- If GUSG is listed as an endangered species, how will that affect recreation facilities such as parking lots?
- If GUSG populations increase, will the species be de-listed?

TECHNICAL MEMORANDUM

DATE: August 18, 2014
TO: Leigh Espy, BLM Project Manager for GUSG Plan Amendment
SUBJECT: Meeting Record, GUSG Public Scoping Meeting, Montrose, Colorado

Date, Time, and Location: August 6, 2014 at 6:00 pm at the Holiday Inn Express in Montrose, CO. This technical memorandum summarizes the information associated with the public scoping meeting conducted in Montrose, CO on August 6, 2014 for the Gunnison Sage-Grouse (GUSG) Range-Wide Amendment and EIS Project.

Attachment A contains the list of attendees and Attachment B contains photographs taken during the scoping meeting.

In general, the agenda for the meeting followed the approximate timeline below:

- 6:00 p.m. —6:30 p.m. Open House
  The public had an opportunity to talk to BLM representatives one on one and review maps and information posters.
- 6:30 p.m. —6:35 p.m. Brief Introductory Comments
  County Commissioner Ron Henderson
- 6:35 p.m. —6:55 p.m. Presentation
  Leigh Espy, BLM Project Manager, gave a presentation.
- 6:55 p.m.—8:00 p.m. Question and Answer Session
  The public was provided an opportunity to ask BLM questions about the project.

Questions at the Montrose meeting generally fell into the following categories:

Questions Related to the Process (including comment process, access to information, relationship of Amendment to existing land uses and private lands, and relationship to FWS process)

- Do you have to provide a scoping comment during the scoping period to have protest standing?
- Are you preparing a plan for management of sage grouse habitat that will be used by all affected RMPs? Will the Amendment be a separate document attached to existing plans?
- What if FWS does not make their decision in November; what if the decision is deferred until a later date?
- What can private landowners do to fit in with the plan? For example, water improvements, fences that need maintenance, and placing ladders in water troughs.

- Implementation of the Plan will be up to each Field Office, but often there is a lack of budget to monitor whether the plan is being implemented properly. What if there is no budget at the Field Office level for adequate monitoring and oversight?
- For comments regarding habitat within a National Conservation Area (NCA) or easement, who should I submit my comments to, the Field Office or the NCA manager or both?
- National Conservation Areas—the designation—tends to increase visitation to such areas; and increased visitation can increase impacts to GUSG habitat and other resources in the NCA. It's hard to maintain current uses, with the increased visitation. Need to consider visitation impacts to GUSG.
- Is the BLM Plan Amendment contingent on the FWS decision of whether or not to list GUSG?
- How can the BLM go forward with Plan when the FWS listing is not until November?

Questions related to the Scope of Alternatives

- I have noticed differences in the BLM and FWS habitat area maps; particularly with areas mapped as habitat buffers. Which agency will make the final decision regarding mapping of areas for habitat designations?
- Will there be different management direction for each habitat type—occupied, unoccupied, and potential?
- Will unoccupied lands be managed the same as occupied, or will the management be different until the area is proven to be occupied?

TECHNICAL MEMORANDUM

DATE: August 18, 2014
TO: Leigh Espy, BLM Project Manager for GUSG Plan Amendment
SUBJECT: Meeting Record, GUSG Public Scoping Meeting, Dove Creek, Colorado

Date, Time, and Location: August 7, 2014 at 6:00 p.m. at the Dove Creek High School, Dove Creek, CO. This technical memorandum summarizes the information associated with the public scoping meeting conducted in Dove Creek, CO on August 7, 2014 for the Gunnison Sage-Grouse (GUSG) Range-Wide Amendment and EIS Project.

Attachment A contains the list of attendees and Attachment B contains photographs taken during the scoping meeting.

In general, the agenda for the meeting followed the approximate timeline below:

- 6:00 p.m. – 6:30 p.m. Open House
  The public had an opportunity to talk to BLM representatives one on one and review maps and information posters.
- 6:30 p.m.– 6:35 p.m. Brief Introductory Comments
  Julie Kibel, Dolores County Commissioner.
- 6:35 p.m. – 6:50 p.m. Presentation
  Leigh Espy, BLM Project Manager, gave a presentation.
- 6:50 p.m.– 8:00 p.m. Question and Answer Session
  The public was provided an opportunity to ask BLM questions about the project.

Questions at the Dove Creek meeting generally fell into the following categories:

Questions Related to the Process

- What impact will the BLM Plan Amendment have on the FWS listing decision in November?
- What can people expect in return from submitting their comments; how will the public be responded to?
- I understand that you must submit comments now in order to submit comments later during the protest period. During the protest period, are you limited to only protesting the subject areas you commented on in scoping?
- Are these comments doing any good? How will BLM track these comments being asked tonight, since no one is providing their names?

- Commissioner Williams directed a question to Congressional representatives in the room, asking them how the FWS potential listing is being viewed in Washington DC and how it will affect the listing?

Questions related to Economics and Private Lands Impacts

- Dolores County has been dedicated to personal property rights. Whatever BLM does, on lands adjacent to private property affects the private lands.
- How can farmers and ranchers of Dolores County get listed as endangered species (i.e., referring the social and economic impacts in the county)?
- My personal property is identified as critical habitat. Additionally, Colorado Parks and Wildlife acquired 135 acres north of my property for GUSG. What are they going to do with that property? Enhance the vegetation for GUSG?
- The County purchased State land for sage grouse preservation – how might the BLM Amendment affect those lands? It would be good to make all conservation measures the same.
- Through the Homestead Act, the Government gave land to ranchers, "forever." I feel that what FWS is proposing is to take land away from us. Dolores County is the second poorest county in the State; we already have enough economic barriers and they need to be considered in the analysis.
- I am concerned about federal agencies taking control of private land. For example, if you have taken any government money, e.g., crop insurance, then the government can tell you what to do on your private land. Does this also apply to FWS having the right to tell us what to do?
- Is there information on buffer zones being applied to critical habitat, specifically will it expand to private property?
- Why is GUSG so important to protect, that it can justify impacting hundreds of thousands of people/businesses?
- I am concerned about the economic impacts. For example, Utah experienced a million dollar loss with oil and gas leases, and the Potash losses will probably be billions of dollars lost.
- Will traditional uses be banned on private land and if so, will that be considered "a taking?" For example, there is private land identified as critical habitat that is currently being used for gravel pit; if they have to stop operations, will that be considered "a taking?"

Questions related to the application of Conservation Measures with regard to Minerals and Split Estate Development

- I am familiar with mitigations applied to oil and gas development to protect Greater Sage Grouse. Will conservation measures for GUSG be similar for mineral development (e.g., leasing stipulations detailing noise, and timing restrictions)?
- The company I work with has leaseholds in both occupied and unoccupied habitat types. Will there be different conservation measures for occupied and unoccupied critical habitat?
- Can you explain how the conservation measures on BLM lands will affect adjacent lands and split estate lands?
- Can you clarify who has the jurisdiction on split estate lands (private surface/federal mineral); who dictates the conservation measures that will apply to the surface, Colorado Oil and Gas Conservation Commission (COGCC), BLM, or the county?

Questions related to the Analysis and Range of Alternatives

- Will the BLM validate the critical habitat polygons? In some cases, the polygons identify critical habitat that is actually a pinto bean field. Is that critical habitat?
- How can BLM determine sufficient habitat if a population goal has not been established? Shouldn't habitat be based on the number of birds?
- Can BLM influence other agencies regarding conservation measures and minimizing impacts to private lands?
- Will permitted grazing on BLM lands be eliminated for GUSG habitat?

Questions related to Predators

- Commissioner Williams stated that predators are bad in Dolores County and expressed concern that the BLM has little control over Colorado Parks and Wildlife's management and control of predators. Can BLM pressure them to review the impact predators are having on the county?
- How do the agencies know if a predator killed a sage grouse? Is there science regarding GUSG death by predators?
- The predator problem needs to be addressed.

Questions to be addressed by the USFWS (FWS)

- Who is FWS parent organization? FWS ignored our comments; it was very disrespectful.
- How many GUSG are enough to avoid ESA listing? Also, is anyone considering commercial production to increase numbers?

- Isn't the FWS required to do an economic impact study before listing a species?
- FWS said they would come back and meet with this community again – they have not, why?
- Answers seem to keep coming back to the separation between BLM and FWS. Does FWS have their own scoping process? How do the comments we submit to BLM get to the FWS?
- Who (meaning the actual individual's name) proposed that the GUSG be listed for Endangered species status? How can we find out?

Appendix J – Cooperating Agency Letter

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215-7210
www.co.blm.gov

In Reply Refer To:
6500 (CO-910)

JUL 0 9 2014

Mr. Bruce Adams
Chairman
San Juan County
PO Box 9
Monticello UT 84535

Dear Mr. Adams:

The Bureau of Land Management (BLM) invites you to participate as a cooperating agency in formulating a Plan Amendment/Environmental Impact Statement (EIS) that sets forth an effective strategy for conserving Gunnison Sage-grouse habitat on BLM-administered public lands throughout the range of the species. The range-wide planning area consists of over 625,000 acres of BLM surface estate in Chaffee, Delta, Dolores, Gunnison, Hinsdale, Mesa, Montrose, Ouray, Saguache, and San Miguel counties in Colorado, Grand and San Juan counties in Utah.

The BLM Colorado is leading the effort to evaluate existing and potential measures for protecting the Gunnison Sage-grouse and its potential proposed critical habitat on behalf of BLM Colorado and BLM Utah. The BLM expects to have consistent objectives and conservation measures in place by July 2016.

Background

The Gunnison Sage-grouse *(Centrocercus minimus)* is a ground-dwelling bird requiring large expanses of sagebrush, along with a diversity of grasses and forbs, and healthy wetland and riparian ecosystems. In January 2013, the U.S. Fish and Wildlife Service (FWS) published a proposed listing and critical habitat decision for the Gunnison Sage-grouse indicating that listing the species as "Endangered" was warranted. In its preliminary finding, the FWS cited the inadequacy of regulatory mechanisms for conserving the Gunnison Sage-grouse and its habitat as a significant threat to the species' survival and further recommended that the BLM incorporate additional conservation measures into applicable BLM resource management plans.

National Environmental Policy Act Compliance

The BLM has determined that the proposed plan amendment constitutes a major federal action requiring the preparation of an EIS in accordance with the National Environmental Policy Act (NEPA). The BLM will seek public and agency input to identify issues to address in the EIS and will coordinate with local, state and other federal government agencies in preparing the EIS. The

2

plan amendment will address proposed and alternative policies and analyze how implementation of the policies might affect the quality of the environment.

Cooperating Agency Participation

The BLM anticipates that a variety of partners, including cooperating agencies, stakeholders and each of the affected BLM Resource Advisory Councils in Colorado and Utah will be involved throughout the planning effort. We would like to invite you to partner with us in a cooperating agency relationship for preparation of the Draft Plan Amendment/ EIS. Council on Environmental Quality (CEQ) regulations implementing NEPA (40 C.F.R. 1500-1508) emphasize the use of such arrangements as a means of ensuring timely coordination between the BLM and tribal, state, local and other federal agencies during NEPA analysis and document preparation. The BLM places great importance on effective collaboration with its partners through the cooperating agency relationship. Further information on cooperating agencies is available online at: http://www.blm.gov/wo/st/en/info/nepa/cooperating_agencies.html

As defined by CEQ and BLM regulations, your agency is eligible for cooperating agency status on the Gunnison Sage-grouse Range-wide Plan Amendment/EIS on the basis of its jurisdiction by law. Your agency's participation and perspective will be invaluable in helping the BLM to formulate an effective Gunnison Sage-grouse habitat conservation strategy. BLM decisions regarding public lands can have a tremendous effect on neighboring communities and the involvement of your agency as a cooperating agency can help to ensure that such decisions are sound and incorporate appropriate and effective landscape level considerations and measures.

The BLM anticipates a timeframe of approximately 24 months from project initiation to the issuance of a Final Plan Amendment/Record of Decision. The planning effort will involve multiple steps, including the preparation of a Draft Plan Amendment/EIS, Draft and Final Biological Assessments, a Draft Biological Opinion, a Proposed Plan Amendment/Final EIS and the Final Plan Amendment/Record of Decision. As such, review timeframes for both the BLM and cooperating agencies will be brief. Although established timeframes must be adhered to closely in order to keep the project on schedule, cooperating agencies may negotiate their level of involvement consistent with available staffing and resources.

If you are interested in participating as a cooperating agency; please contact Leigh D. Espy, Project Manager at (303) 239-3801or lespy@blm.gov. Current information regarding the plan amendment will be maintained online at the BLM Colorado Gunnison Sage-grouse planning webpage: http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse.html

Thank you for considering our invitation. We look forward to working with you and your agency throughout this important planning effort.

Sincerely,

Lonny R Bagley
for Ruth Welch
State Director

Appendix K – Tribal Consultation Letter

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215-7210
www.co.blm.gov

In Reply Refer To:
6500 (CO-910)

JUL 0 9 2014

CERTIFIED MAIL – 70112000000185698565
RETURN RECEIPT REQUESTED

Chairman Herman Honanie
The Hopi Tribe
PO Box 123
Kykotsmovi AZ 86039

Dear Chairman Honanie:

The Bureau of Land Management (BLM) is initiating a Plan Amendment/Environmental Impact Statement (EIS) to provide an effective landscape level strategy for managing Gunnison Sage-grouse habitat on BLM-administered lands in ten southwestern Colorado and two southeastern Utah counties. BLM Colorado has been asked to lead this effort on behalf of BLM Utah.

In accordance with Section 202(c)(9) of the Federal Land Policy and Management Act, Section 101(d)(6) of the National Historic Preservation Act, The American Indian Religious Freedom Act, Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments), Executive Order 13007 (Indian Sacred Sites), and Executive Order 12898 (Environmental Justice) and consistent with the Department of the Interior 2011 Tribal Consultation Policy, we are writing to initiate government-to-government consultation with the Hopi Tribe, as well as to seek a dialogue with you and your staff regarding how the Tribe would like to be involved in this important effort.

The U.S. Fish and Wildlife Service has proposed listing the Gunnison Sage-grouse *(Centrocercus minimus)* as endangered and designating critical habitat for the species in accordance with the Endangered Species Act. The Plan Amendment could replace direction in up to eleven existing BLM resource management plans (RMPs) governing activities on BLM-administered public lands throughout the species' range. The BLM expects to have consistent objectives and conservation measures in place by July 2016.

In order to ensure that resources and places of traditional cultural or religious significance to the Hopi Tribe, are appropriately considered and addressed during NEPA analysis and Section 106 review, the BLM asks for your help in identifying any resources or sites within the Planning Area that could be affected by the Plan Amendment. We recognize that the decision to share this information resides with the tribes. Early identification enables the BLM to address potential impacts as plans and alternatives are being developed and refined.

2

Our goal is to work with the public and tribes to identify areas in which there is agreement on natural and cultural resource management approaches, and work toward potential solutions for those areas where disagreement exists. Because we are in the initial stages of the process, we would like to offer the following broadly framed questions as a starting point from which to begin identifying issues to be addressed during the planning effort:

- How should resources be managed in order to ensure that cultural sites are protected and that Gunnison Sage-grouse habitat is effectively conserved?
- What issues regarding Gunnison Sage-grouse management are of greatest significance to the Tribe and how can these issues best be addressed and incorporated into the planning effort? What are some ways in which BLM-administered lands can be managed to best reflect tribal issues or concerns related to the Gunnison Sage-grouse?
- Are there places and areas related to Gunnison Sage-grouse habitat of special concern to the Tribe that should be considered during the planning effort or any already identified areas that might require additional consideration? If so, how can we manage these lands in a manner that best protects information considered sensitive and/or confidential?
- Are there any identifiable measures that the BLM Colorado State Office should take during the planning effort to actively promote a positive relationship with the Tribe?

In addition to tribal consultation, your Tribe has been offered the opportunity to participate as a cooperating agency (per Council on Environmental Quality regulations implementing NEPA (40 C.F.R. 1500-1508) based on the Tribe's knowledge of local social, economic, and natural resource conditions, as well as traditional ecological knowledge. While not replacing government-to-government consultation, cooperating agency status can serve as a useful supplement.

Additional information about the project timeline, public meetings, and the planning effort can be found at: http://www.blm.gov/co/st/en/BLM_Programs/wildlife/sage-grouse.html

In the spirit of government-to-government consultation with the Hopi Tribe, the BLM welcomes your participation during the Gunnison Sage-grouse range-wide Plan Amendment process. We would be glad to provide further information on government-to-government consultation, as well as the planning effort. If you have any questions or concerns, please feel free to contact Leigh D. Espy, Project Manager at (303) 239-3801. We look forward to meeting with you and working together to identify effective management strategies.

Sincerely,

Lonny L Bagley
for Ruth Welch
State Director

cc: Mr. Leigh Kuwanwisiwma
Director
Hopi Cultural Preservation Office
PO Box 123
Kykotsmovi AZ 86039

Appendix L – Alphabetical List of Commenters

Organization/Agency Name	City	State	Zip	Commenter Type
Allen Maez	Lewis	CO		Individual
American Motorcyclist Association	Washington	DC	20001	Organization/ Non-profit
Ann Tagawa	Boulder	CO	80302	Individual
Audubon Society of Greater Denver	Littleton	CO	80128	Organization/ Non-profit
Barbara Bernhardt	Montrose	CO	81403	Individual
Bill Day	Hotchkiss	CO	81419	Individual
Brad Mower				Individual
Brenda Tunget	Austin	CO	81410	Individual
Capital Trail Vehicle Association (CTVA)	Helena	MT	59604	Organization/ Non-profit
City of Gunnison	Gunnison	CO	81230	Local
CO Parks and Wildlife, Southwest Region Office	Durango	CO	81303	State
County Coalition for the Gunnison Sage-grouse	Gunnison	CO	81230	Local
Darla Reeves	Golden	CO		Individual
David Wiens	Gunnison	CO	81230	Individual
Delta County Board of County Commissioners	Delta	CO	81416	Local
Dennis Pritchard				Individual
Gunnison County Stockgrowers Association, Inc.	Gunnison	CO	81230	Organization/ Non-profit
History Colorado	Denver	CO	80203	Organization/ Non-profit
Illegible names				Individual
International Mountain Bicycling Association (IMBA)	Boulder	CO	80301	Organization/ Non-profit
Irv Christy	Grand Junction	CO	81503	Individual
J. Grace Ellis	Tempe	AZ	85282	Individual
Jean Public				Individual
Jeff Schaaf				Individual
John Justman, Mesa County Board of Commissioners	Grand Junction	CO	81502	Local
Jon Waschbush, Montrose County Govt. Affairs				Local
Kathy Borinski	Montrose	CO		Individual
Larry Byrnes	Dove Creek	CO	81324	Individual

Organization/Agency Name	City	State	Zip	Commenter Type
Linda Andes-Georges				Individual
Mark & Hank LeValley, LeValley Ranch, LTD	Hotchkiss	CO	81419	Individual
Marsha Ashburn	Durango	CO	81303	Individual
Miscelle Allison				Individual
Montrose County Board of County Commissioners	Montrose	CO	81401	Local
Nancy Stocker	Denver	CO	80210	Individual
Off-Road Business Association, Inc., Trails Preservation Alliance, CO Snowmobile Association, CO Off-Highway Vehicle Coalition				Organization/ Non-profit
Oscar Massey	Whitewater	CO		Individual
Penny Morrow				Individual
Peter Rocco	Tempe	AZ	85282	Individual
Phyllis Snyder	Cortez	CO	81321	Individual
Poncha Pass Gunnison Sage-grouse Local Working Group	Mone Vista	CO		Organization/ Non-profit
Public Lands Advocacy	Denver	CO	80247	Organization/ Non-profit
Robert B. Irvine, Jr.				Individual
Robert N. Stocker	Denver	CO	80210	Individual
Rocky Mountain Wild, Defenders of Wildlife	Denver	CO	80302	Organization/ Non-profit
San Juan County Commission	Monticello	UT	84535	Local
San Miguel County Board of Commissioners	Telluride	CO	81435	Local
The Hopi Tribe	Kykotsmovi	AZ	86039	Tribal Government
The Navajo Nation, Historic Preservation Department	Window Rock	AZ	86515	Tribal Government
The State of Utah				State
The Wilderness Society, Conservation Colorado, Audubon Rockies	Denver	CO	80202	Organization/ Non-profit
Timothy R. Canon II for Bjork Lindely Little PC	Denver	CO	80202	Industry
Tri-State Generation and Transmission Association, Inc.	Denver	CO	80233	Industry
United Four Wheel Drive Associations				Organization/ Non-profit
US EPA, Region 8	Denver	CO	80202	Federal

Organization/Agency Name	City	State	Zip	Commenter Type
Valerie Staley-Maez	Lewis	CO	81327	Individual
W. Lavon Harkendorff				Individual
Western Energy Alliance	Denver	CO	80203	Industry
Western Watersheds Project, Center for Biological Diversity	Hailey	ID	83333	Organization/ Non-profit
Wild Earth Guardians	Laramie	WY	82070	Organization/ Non-profit

Appendix M – Comments Organized by Resource Category

Table 4 - Comments pertaining to Data and Best Available Science

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000001	the science for greater sage grouse and Gunnison sage grouse are broadly similar, which means that the findings of scientific studies on greater sage grouse, and recommendations for their conservation, should be viewed as the best available science and recommendations for Gunnison sage grouse as well unless conflicting studies particular to the Gunnison sage grouse are available to supersede them.
001	Studies to be reviewed by BLM	000003	In considering the best available science for Gunnison sage grouse, BLM should bear the following in mind: Scientific studies require independent data collection and analysis, subjected to statistical testing, with a finding that $p < 0.05$, which is required to substantiate a scientific conclusion. • Peer-reviewed studies published in reputable scientific journals are to be given greater scientific credence than unpublished, peer-reviewed studies (such as Master's theses and PhD dissertations). • The conclusions of peer-reviewed, review articles published in reputable scientific journals, which do not include data analysis of their own, are science and should be weighed based upon the collective scientific merit of the published studies which they review. • Unpublished, non-peer-reviewed studies that nonetheless include data gathering and rigorous statistical testing (such as agency internal studies) may still be considered science, but are to be given less weight than completed unpublished studies performed by graduate students (which must at least pass the review of a graduate committee of PhDs). CONTINUED IN NEXT CELL
001	Studies to be reviewed by BLM	000003	In considering the best available science for Gunnison sage grouse, BLM should bear the following in mind: Unpublished studies that have not been peer-reviewed, remain unpublished, and which are in draft form should be treated with skepticism. • Data that is presented in graphic, tabular, or other form but which has not been subjected to rigorous statistical testing should be treated as data for informative purposes, but it is not science. • The opinions and recommendations of scientists who have had scientific research published in peer-reviewed scientific journals should be treated as opinions and recommendations of published scientists, not as science itself. • The opinions and recommendations of personnel whose job titles suggest scientific credentials but who have never published scientific findings in peer-reviewed journals should be considered the opinions and recommendations of non-scientists. We have expended the effort to lay out these principles because in the recent past, BLM has confused scientific recommendations (which are published in peer-reviewed journals) with policy recommendations (which are published in management plans such as the State of Colorado's Gunnison Sage-grouse Rangewide Conservation Plan).
008		000001	Analyze best available knowledge—and factor in what we know that we do not know (climate change impacts).

Submission Number	Remarks	Comment Number	Comment
012		000001	A tremendous amount of research and information pertaining to conservation measures already exists and can be acquired through Colorado Parks and Wildlife (CPW). Additional conservation measures are contained in the 2005 Rangewide Conservation Plan (RCP) to which BLM Colorado is a signatory. We hereby request that BLM focus the current NEPA analysis on determining appropriate alternatives to incorporate these existing conservation measures into the applicable Resource Management Plans (RMPs).
012		000005	We request that BLM's use of Greater sage-grouse science be limited, and if considered, be thoroughly reviewed by Gunnison Sage-grouse experts before use in the EIS/RMP amendments.
013		000007	Motorized recreationists see the sage grouse as another potential mechanism used by the Forest Service and Bureau of Land Management to close public lands to motorized access and motorized recreation without any real basis for assumed impacts and conditions. To avoid this serious issue, the EIS must be based on site-specific information and data. The EIS and decision must be based on site specific data prepared by licensed biologists and peer reviewed by independent licensed biologists in all impact areas where significance is claimed.
013		000008	The 3-State OHV decision and National OHV rule require site-specific data and analysis to be used in any actions that could affect OHV recreation.
013		000013	The EIS must evaluate and acknowledge that close range viewing of sage grouse leks produces significantly more impacts on sage grouse than motorized recreation which is located some distance away. The EIS must include an accurate inventory of all viewing activity in order to reasonably assess this activity and its impact. Examples of the popularity and magnitude of the lek viewing activity include:
018		000005	we urge the BLM to ensure that the best available science has been employed in determining the causes of the Gunnison sage-grouse's decline before implementing "solutions" that could limit access to America's public lands.
019		000001	The Off Road Business Association is a national not-for-profit trade association of motorized off-road related businesses formed to promote and preserve off-road recreation in an environmentally responsible manner and appreciates the opportunity to provide comments on this issue. The Organizations, COHVC, CSA, TPA, and ORBA vigorously support the adoption of the 2005 Gunnison Sage Grouse Rangewide Conservation strategy as the basis for the LUPA, however ORBA is aware that there are efforts in place to update this document. While the exact timeframe for release for the release of this updated document is unclear, ORBA vigorously assert that the updated Conservation Strategy must be incorporated in the LUPA upon its release.
019		000002	ORBA supports the 2005 Plan as the starting point for development of the LUPA.

Submission Number	Remarks	Comment Number	Comment
019	See graph included in letter and attached CPW study for comments	000005	ORBA has been concerned that while recreational usage of habitat is not an issue, often access to these habitat areas via a road and trail network has been tangentially brought into management standards that are based on surface disturbance standards. ORBA would note that the possible impacts of road and trail usage is an issue that has been addressed in extensive research conducted by Colorado Parks and Wildlife which has concluded as follows: "To explore the role that roads may play on the population of GuSG in the Gunnison Basin, CPW conducted a GIS analysis of the frequency (at 100 m intervals) of the Euclidean distances for successful and unsuccessful nests to the nearest road. Roads include highways and county roads in Gunnison and Saguache counties. "Primitive" roads were not included as was done in Aldridge et al. (2012), thus making our analysis a more conservative approach. Figure 3 illustrates a declining trend in the number of nests further away from roads with no apparent impact on nest success (i.e., grouse are not "avoiding" roads as suggested in Aldridge et al. (2012)). Approximately 45% of the nests are within 300 m of a road and 70% of the nests are within 500 m. The frequency declines > 500 m from a road. Apparent nest success was similar across all intervals. This analysis does not account for age (yearling vs. adult), renesting (however, only 3.2% of females [6/185 nests] renested), or time (same female observed across years). ORBA respectfully submits that the work and analysis provided in the comments of Colorado Parks and Wildlife regarding the lack of impact to Grouse activities from the dispersed road and trail network clearly represent best available science on this issue and must be addressed. Merely asserting an impact is present, in light of this research, fails to address statutory requirements that best available science be relied on in ESA issues.
021		000004	We also urge BLM not to rely on the agency's 2011 National Technical Team (NTT) report, entitled *A Report on National Greater Sage-Grouse Conservation Measures,* in the revised RMPs. While all the recommendations in the NTT report are specific to Greater Sage-Grouse (GuSG), we are concerned BLM may incorporate recommendations from the report into the amended RMPs. The use of the NTT report is extremely problematic as it relies on flawed science. Using flawed science such as the NTT report to support overly burdensome restrictions that are not based on local conditions in Utah and Colorado is not justified.
021		000006	We also strongly oppose FWS' intention to designate over 1.7 million acres in Colorado and Utah as critical habitat for the species because the proposal is ill-conceived and lacks an adequate scientific basis.2 In general, the critical habitat designation proposed by FWS is not based on the best scientific and commercial data available because it includes areas that may not have the biological features essential to the conservation of GUSG, including broad swaths of land that may lack any present or foreseeable need for special management for the species.
021		000009	BLM must also analyze, consider, and incorporate into the RMP revisions new information related to the species and its habitat provided by the States of Colorado and Utah. Both states recently assembled a vast array of scientific data about population trends, habitat quality, and other pertinent information that will be useful for BLM's planning efforts.

Submission Number	Remarks	Comment Number	Comment
021		000014	The use of the NTT report is extremely problematic as it contains overly burdensome recommendations that are not based on local conditions in Utah and Colorado. The NTT report is fundamentally flawed for a number of reasons...For more information, please refer to the attached independent review which describes a number of shortcomings with the report.
021	Information request	000022	According to the NOI, "the BLM will consider FWS developed Gunnison Sage-Grouse conservation measures" *79 FR 42034.* We are unable to locate these FWS-developed GuSG conservation measures. BLM should make these measures available to the public before the development of the draft RMP amendments, so the public can adequately assess these measures, underpinning scientific data, and their purported effectiveness.
023		000001	The Gunnison Sage-grouse Rangewide Conservation Plan (CPW 2005) ("RCP") is the primary source of significant high quality Gunnison Sage-Grouse ("GuSG") conservation information. We invite the BLM to be a participant in this collaborative effort for coordination of local, state and Federal efforts to protect the species.
023		000006	This planning effort should support science based conservation actions that best meet the needs of the GuSG.
023		000008	Holistic Habitat Management. It is critical to manage GuSG habitat across jurisdictional and property boundaries using the best available science and the RCP.
023		000009	USE OF BEST AVAILABLE SCIENCE. We suggest that the proposed analytic framework be based upon the best available science for the GuSG to include: 1. Use of the best available scientific information and spatial data. 2. Inclusion of RCP recommendations and guidelines. 3. Support and need of a centralized landscape/ecosystem based plan. However, specific implementation of management strategies would need to be customized to local site specific conditions and need to have been demonstrated as being effective. 4. Based upon input from experts in the field of Gunnison Sage-grouse conservation, that BLM's use of Greater sage-grouse science be limited, and if considered, be thoroughly reviewed by Gunnison Sage-grouse experts before use in the EIS/RMP amendments. A detailed summary of the current science related to the species is provided in the three comment letters provided by Gunnison County to the U.S. Fish and Wildlife Service dated April 2, 2013, October 18, 2013 and November 26, 2013 in response to the Proposed Rule for the Endangered Status for Gunnison Sage-grouse and may be reviewed at http://www.regulations.gov under Docket No: FWS-R6-ES-2012-0108; 450003011 3.
024		000003	Will new conservation measures include all of the best available science on the grouse?
029		000007	Please utilize the best available science which clearly shows the deleterious impacts of livestock grazing, oil and gas drilling, and motorized travel on the grouse's struggle to survive.

Submission Number	Remarks	Comment Number	Comment
030		000003	The Gunnison Sage-grouse Rangewide Conservation Plan (CPW 2005; RCP) is nine years old. New scientific data has shown that some of the assumptions are no longer valid, e.g., lek buffer distances (Halloran 2005, Johnson et al, 2011). We ask that you look at the most recent peer-reviewed literature and data on GUSG habitat requirements and BMPs. We believe BLM should consider an increase in buffer distances for all new land disturbing activities. We also suggest that the BLM encourages the revision of the RCP and takes an active role in helping revise the RCP.
030		000007	We suggest that the BLM support and consider other data in addition to lek count numbers from Colorado Parks and Wildlife when determining population size, e.g., number of translocated birds still alive, and the work of Sara Oyler-McCance on Estimating Gunnison Sage-grouse Demographic Parameters Using DNA as an Individual Marker for Mark-Recapture Analysis.
030		000008	In addition to looking at existing Land Health Standards, we recommend evaluating Sage-grouse Habitat Assessment Framework data. It is critical to monitor this data and make changes to causative factors if the habitat is not meeting guidelines for GUSG. In many cases, normal grazing standards (or the lack of adjustment and enforcement) don't appear to be protecting GUSG habitat quality.
030		000009	We appreciate this planning consideration and consider it very important. We encourage the BLM to look at the San Miguel Basin Gunnison Sage-grouse Conservation Plan (2009), available at: http://sanmiguelgrouse.org/conservation-plan
030		000011	We believe it's important to check the validity of aerial data that's used to determine habitat extent and quality. This can be done by ground-truthing or by checking with local experts and landowners.
030		000012	While we agree with taking advantage of FWS and CPW data and expertise, we also believe it's important to take advantage of the expertise of the staff in the NRCS, U.S. Forest Service, and members of local GUSG Working Groups.

Submission Number	Remarks	Comment Number	Comment
032		000001	As justification for this new planning effort, the NOI cites the alleged "*inadequacy of regulatory mechanisms to conserve the GUSG and its habitat*" asserted by the US Fish and Wildlife Service (USFWS) in its preliminary finding to list the GUSG as an endangered species and its proposed designation of critical habitat. We deeply disagree with this conclusion because both the states and affected counties have developed comprehensive conservation plans that unequivocally provide the regulatory certainty required by the USFWS to ensure the species is appropriately protected, as discussed below in these comments. While it is our understanding that 67 percent of GUSG habitat in the Gunnison Basin is owned by the federal government, we caution BLM against relying solely upon the rationalization presented by the USFWS and are encouraged that BLM intends to coordinate its planning efforts with state, local and tribal governments. As discussed below, the site-specific data compiled by many of these entities is more reliable and scientifically valid than the information presented by the USFWS. We recommend that BLM utilize the GUSG data compiled by the Colorado Division of Wildlife and Parks (CPW) and the Utah Division of Wildlife Resources (DWR) during this planning effort to eliminate excessive and unwarranted management decisions.
032		000002	As previously indicated, the material relied upon by the USFWS has been discovered by CPW and DWR to be substantially misconstrued while failing to consider relevant published and peer-reviewed scientific bodies of work that would have altered the Service's conclusions. In particular, the state agencies found that the USFWS relied upon flawed literature sources that cannot be confirmed by scientific data. Ultimately, the states maintain that existing data do not support the conclusion that the GUSG is threatened throughout all or a significant portion of its range. Instead, they contend that the species is actually and effectively protected throughout a significant portion of its range. statements made about fragmentation of habitat and the impact (or lack thereof) of fences on sage-grouse mortality rates.

Submission Number	Remarks	Comment Number	Comment
032		000003	To date, at least 80 percent of the occupied habitat within the Gunnison Basin is subject to protection measures, such as current BLM wildlife management requirements and standards, and private lands with Conservation Easements (CEs), Candidate Conservation Agreements with Assurances (CCAA), and similar legal instruments that preclude development to the detriment of grouse. It is important to note that many large tracts are protected from development while many other areas are subject to specific GUSG conservation measures. Additionally, another 54 percent of occupied habitat is protected within the range of the other six small populations. To date, CPW has determined that nearly 80% of the Basin population's habitat is protected from the habitat threats identified by the USFWS in its regulatory proposals. the GUSG Rangewide Conservation Plan was adopted in April of 2005 to provide further guidance for local working group conservation efforts. Participants in the development of the Rangewide Plan included the BLM, US Forest Service (USFS), USFWS, CPW and the Utah Division of Wildlife Resources (DWR), along with the local working groups. Clearly much thought and expertise went into developing the Rangewide Plan, which is regularly reviewed and updated. Due to its comprehensive scope, we recommend that the Rangewide Plan be used as the basis for management of federal lands because it establishes acceptable measures and parameters for population protection, monitoring and management, habitat conservation along with extensive research of the species. In 2010, NRCS launched the Sage Grouse Initiative (SGI), which is designed to benefit sage-grouse populations through a wide variety of conservation practices. To date, NRCS has facilitated the use of conservation easements to prevent working ranches from being subdivided; grazing systems that provide cover for birds; and the removal of invasive plants to allow birds to return to otherwise suitable habitat. NRCS has also worked to modify the placement of high-risk structures near breeding sites, offering additional protection of the species.

Submission Number	Remarks	Comment Number	Comment
032		000010	NTT Report We would strongly object to any reliance by BLM on the NTT report as its principal guiding document for managing GUSG habitat. An objective overview of the Cooper Ornithological Society's Monograph: Studies in Avian Biology (Monograph), the primary source of information relied upon by the NTT, was conducted by the Center for Environmental Science, Accuracy and Reliability (CESAR) in February 2012 entitled "Science or Advocacy?" which found: significant mischaracterization of previous research; substantial errors and omissions; lack of independent authorship and peer review (3 of the authors of the NTT are also the authors, researchers, and editors on 3 of the most cited sources in the NTT.); methodological bias; invalid assumptions and analysis; and inadequate data. Reviews of the Monograph were also conducted separately by scientists commissioned by the State of Colorado who found the same exact defects. Similar findings regarding the NTT report were made in a review prepared for Western Energy Alliance in which it was discovered that "the NTT report represents a partial presentation of scientific information to justify a narrow range of preferred conservation measures and policies that will be imposed as land use regulations by the BLM. In contrast, an objective scientific review would have led to a broadening of conservation alternatives for decision makers to choose from." With respect to oil and gas, "the NTT presents a biased view of oil and gas operations by conveying that 'impacts are universally negative and typically severe.' The NTT then selectively presented information in support of its conclusions, while ignoring contrary information. Key assertions in the NTT report are both biased and in error, especially the frequently repeated, but erroneous assumption, that a temporary decrease in lek counts immediately adjacent to active wells is equivalent to a population decline."
032		000013	USFWS data is flawed and scientifically invalid and must be discounted by BLM, BLM's use of scientific data compiled by CPW and DWR is essential, BLM must recognize and achieve consistency with current conservation measures established by local GUSG working groups and the Rangewide Conservation Plan for the GUSG, GUSG conservation measures must be limited to occupied and suitable habitat, BLM must not employ measures that deviate from existing conservation plans unless it is clearly and scientifically demonstrated to be necessary in the DEIS, BLM must not rely upon the flawed findings of the NTT Report when determining appropriate mitigation or conservation measures for the GUSG
038		000001	In addition to the RMP amendments I would urge the BLM to be closely involved with efforts to update the Gunnison Sage-grouse Rangewide Conservation Plan as well as expanding/adopting the Gunnison Basin Candidate Conservation Agreement (CCA) for Gunnison Sage- grouse to the satellite populations. The Saguache County Board of County Commissioners is a signatory to the Gunnison Basin CCA and so it would seem that much of the work to adopt GUSG regulations in the CCA for the Poncha Pass Population which is also in Saguache County is already in place.

Submission Number	Remarks	Comment Number	Comment
038		000002	I urge the BLM to utilize habitat information collected over the years at Poncha Pass when evaluating and formulating habitat guidelines for GUSG at Poncha Pass. Habitat and grazing guidelines should be adaptive and interim so that new knowledge or changing conditions can be incorporated into management of GUSG and its habitat.
041		000005	The EIS should include recommendations and guidelines form the Gunnison Sage-grouse Range wide Conservation Plan (RCP). The RCP is scheduled to be updated and the EIS should reflect that information as well as the BLM should continue to play an active role in the update of the RCP.
041		000006	The EIS shall rely on the current science from the GUSG experts and not just BLM specialists. A detailed summary of the science has been provided to the USFWS and can be found on their website.
041		000007	Specific to science and management, Delta County urges the EIS to include the flexibility to incorporate emerging GUSG research, on-the-ground antidotal observations and ability to adjust management practices when necessary.
043		000001	I would like the BLM to answer to the public what science has been used to determine that the Sage Grouse Historically was on these lands and in what numbers. Please provide science based facts to back your decisions and offer those to the public you are impacting.
045		000001	the question is how to protect GUSG habitat while allowing other uses of federal land managed by BLM. I'm concerned that the relative lack of information about needs of GUSG is going to make it difficult to achieve an appropriate balance. Until better information is available, I hope that BLM will err on the side of caution.
048		000005	Tri-State requests that the BLM address in the DEIS the critical lack of information and research on the effects of tall structures on GUSG. Based on our knowledge and extensive research, no peer reviewed studies have been conducted on the impact of tall structures specifically to GUSG.
048		000006	Additional research is required to better understand the implications of overhead facilities and other aboveground structures on GUSG populations, encompassing the potential for increased predation, ROW avoidance, collision risk, habitat fragmentation, and habitat use. There are no short-term or long-term studies for GUSG regarding potential impacts to leks and nesting productivity as they relate to power line construction and operation. While these species are similar to Greater Sage-Grouse, Tri-State believes that the EIS analysis should fully disclose that management recommendations and analysis for one species may or may not be fitting for GUSG or vice versa. The EIS analysis should also document, where appropriate, why research conducted for the Greater Sage-Grouse can be or has been applied to the GUSG.

Submission Number	Remarks	Comment Number	Comment
048		000007	Tri-State would request that the EIS acknowledges that future research is required to determine effective temporal and spatial buffers and setbacks that will mitigate impacts to GUSG populations from power lines. Buffer guidance should be considered adaptive and the RMP amendment should be written to allow the BLM to modify spatial and temporal buffers as new and better information/data becomes available specific to power line construction, operation, and maintenance. The guidance should also take into account existing disturbance, topography, or land uses in the surrounding environment.
048		000015	Potential line re-location also could result in cumulative impacts to GUSG and their habitats from increased habitat fragmentation across the landscape for power lines that cross federal and private lands and, therefore, could not be moved entirely out of a geographic area (due to engineering constraints or established electrical paths). It is critical that sound science, seasonal habitat mapping, and local population data is used when making a management recommendation to move an existing power line or other electrical facility. The BLM should consider if the most current peer reviewed data indicates if a power line is currently affecting GUSG populations and if moving the line would actually result in a net gain for GUSG populations or disclose if this movement may have unexpected long-term adverse effects.
048		000017	Adaptive management should be used when identifying and implementing management recommendations and conservation/mitigation measures for power line impacts on GUSG. It is critical to better understand if raptor/corvid predation from power lines is a significant source of grouse mortality and how the presence of a power line affects GUSG use of various habitat types within proximity to the power line ROW. Mitigation in the form of funding research studies would be beneficial to both the agencies and industry in helping both groups understand the issues as well as identifying effective mitigation measures that could minimize potential effects. The BLM has acknowledged in public meetings that natural predation could be a significant factor in sage-grouse mortality, yet there is still no clear understanding of the extent of these impacts on overall sage-grouse populations. Additional research funds could be used to better understand natural mortality rates from both mammalian and avian predators and what other limiting factors in any given area are affecting the viability of a specific population.

Submission Number	Remarks	Comment Number	Comment
049		000003	**Use of Best Available Science** The state suggests that the proposed analytic framework be based upon the best available science for the GuSG to include: • Use of the best available scientific information and spatial data available. • Inclusion of Resource Conservation Plan (RCP) recommendations and guidelines. • Feasibility of managing the habitat and species across political boundaries using CPW recommendations and the RCP. • Support and need of a centralized landscape/ecosystem based plan. However, specific implementation of management strategies would need to be customized to local site specific conditions and employ strategies demonstrated to be effective. • Based upon input from experts in the field of GuSG conservation, that BLM's use of Greater sage-grouse science be limited, and if considered, be thoroughly reviewed by Gunnison Sage-grouse experts before use in the EIS/RMP amendments.
049		000006	BLM should recognize the impact, value, and adequacy of current GuSG conservation measures to protect the species including but not limited to the following: • Resource Conservation Plan • Gunnison Basin Candidate Conservation Agreement • Candidate Conservation Agreement with Assurances (CCCA) • Conservation Agreement signed by 11-counties and two states • Local Government Land Use Regulations • Rangewide Non-regulatory local efforts (conservation easements, GuSG habitat projects, Gunnison Basin strategic committee and local work groups.
051		000002	It is widely recognized that the RCP needs to be updated to include a new threats assessment and incorporate the latest science on sage-grouse. The BLM must not rely on the RCP in developing management prescriptions to conserve the Gunnison sage-grouse.
051		000003	There is a substantial body of research on greater sage-grouse, while research on Gunnison sage-grouse has been somewhat limited. It will be necessary to compensate for lack of adequate research on Gunnison sage-grouse by using information from relevant research on greater sage-grouse (much of which is summarized in the National Technical Team Report) to inform development of management prescriptions for Gunnison sage-grouse. However, in doing so, it is critically important to be aware of the considerable difference in the status of the two species. There are many more and much larger greater sage-grouse populations across the West. Thus, Gunnison sage-grouse may require even more protective management prescriptions than those recommended for greater sage-grouse in order to achieve the goal of conserving and recovering the species. BLM should consult with the National Technical Team to determine how they might adjust management recommendations outlined in the report for application to Gunnison sage-grouse, given the difference in the status of the two species.

Submission Number	Remarks	Comment Number	Comment
051		000004	The U.S. Fish and Wildlife Service's (FWS) proposed listing decision for the Gunnison sage-grouse also outlines significant new information and circumstances that must be considered through this planning process (USFWS 2013). The BLM should ensure that the RMP amendment adopts regulatory mechanisms to address all of the threats to the species on BLM lands identified by the FWS in its 2013 listing decision, and utilizes the findings of all of the relevant research summarized in the finding.
055		000010	In addition, CPW recommends that BLM use CPW's most current habitat status maps (occupied, potentially suitable, and vacant/unknown) and the seasonal habitats identified in the GuSGRCP for the EIS analysis. We recommend that BLM incorporate the best available science into the analysis where new research has been completed since the GuSGRCP was drafted. It is important to note that while some research on Greater sage-grouse may be applicable to GuSG, not all research and recommendations made for the Greater sage-grouse can be applied directly to GuSG.
057		000001	Throughout the process, we implore BLM to use the best available data and science which is already available from Colorado Park and Wildlife. We urge BLM to take a commonsense approach to the EIS which uses data from Colorado Parks and Wildlife and strikes an appropriate balance between conservation and multiple use on BLM administered lands.

Table 5 - Comments pertaining to Drought Management and Climate Change

Submission Number	Remarks	Comment Number	Comment
013		000010	Next in line affecting sage grouse populations are natural conditions including weather and fires and induced conditions such as wolves. Sage grouse populations are significantly impacted by natural conditions including drought. The benchmark for evaluation of impacts on sage grouse by OHV recreation should be established by comparison to these natural conditions and hunting regulations. The evaluation and subsequent decision-making must be based on comparison to these real world conditions.
014		000016	As required by Secretary of the Interior Order No. 3289, the BLM must "consider and analyze potential climate change impacts when undertaking long-range planning exercises." ...the impacts of livestock grazing either as both emitters of greenhouse gases (GHGs) and for the reduced ability of the landscape as a carbon sink when vegetation is removed as forage, i.e. "carbon pools" that are extracted and turned into methane in livestock intestines.
014		000017	The EIS must disclose and analyze the changes that are likely to occur in the planning areas due to global climate change over the life of the amended plans. While uncertainties remain regarding the timing and extent of impacts from climate change, modeling indicates that on average, the region will likely experience higher temperatures in all seasons; longer dry periods; heavy precipitation events; more frequent droughts; and increased wildfire risk. These changes will affect the landscape of project area, especially riparian and water resources and the species that depend on them as well as the amount and availability of forage. BLM is required to consider livestock grazing in this context and the needs of sage-grouse in a changing world m be accounted for.
027		000003	One factor that was listed as a reason for the decline of Gunnison sage-grouse by the BLM was degradation of habitat resulting in losses of water table levels. As you know, our area has been in a severe drought for several years so naturally water is a concern for all wildlife. Perhaps the BLM could build more ponds to catch run off in the spring so there would be more water available for the wildlife.
030		000019	San Miguel County is very interested and concerned with climate change. The EIS must have a robust cumulative effects analysis with particular emphasis on the most current projections on how climate change will impact GUSG and planning decisions.
051		000010	The BLM should account for the effects of climate change in management planning for Gunnison sage-grouse (Secretarial Order 3289, 02-22-2010; CEQ Memo, 02-18-2010 (draft)). Climate change is a recognized threat to sage-grouse (Connelly et al. 2011b: 556, Table 24.2; Blomberg et al. 2012; van Kooten et al. 2007) that is also predicted to have deleterious impacts on sagebrush steppe (Schlaepfer et al. 2012; Neilson et al. 2005). Most climate change simulations predict sagebrush steppe will contract as mean temperatures increase and the frost line shifts northward (Blomberg et al. 2012; Neilson et al. 2005). Significant research has been conducted on the effects of climate change in the Gunnison basin.

Submission Number	Remarks	Comment Number	Comment
051		000011	Measures for ameliorating the effects of climate change on species and landscapes include increasing the size and number of protected areas, maintaining and enhancing connectivity between protected areas, and identifying and protecting areas likely to retain suitable climate/habitat conditions in the future (even if not currently occupied by the species of concern). Management should also repulse invasive species, sustain ecosystem processes and functions, and restore degraded habitat to enhance ecosystem resilience to climate change (Chester et al. 2012; NFWPCAS 2012).
055		000007	Weather/Drought can impact GuSG habitat quality. We suggest that the BLM consider projected changes in the climate in planning habitat enhancement and restoration projects to maintain healthy functioning landscapes/ecosystems.
063		000002	Drought is also an extremely important factor that must be considered and given and hold equal weight.
063		000006	The climate in the Southwest and predation are the main causes for the Sage Grouse not able to flourish in this area and coupled with the general poor quality of potential for the region, it does not dictate a good potential for the area for any reason what so ever. This part of the Southwest has always been and always will be extremely arid.

Table 6 - Comments pertaining to Energy and Mineral Development

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000034	We recommend that all potential Critical Habitats identified by USFWS should be closed to future fluid minerals leasing, in order to head off future conflicts between fluid minerals development and sage grouse conservation.
001	Studies to be reviewed by BLM	000036	it is critically important for BLM to identify and protect winter concentration areas. The location of these habitats must be mapped and fully disclosed in the EIS. These lands, once identified under the RMP amendment, should be withdrawn from future mineral leasing and entry of all kinds, with Conditions of Approval applying NSO stipulations inside and within 2 miles of these areas, disturbance limits of 3% per square mile and one wellpad per 640-acre section, exclusion of overhead powerlines, and seasonal road closures within the winter habitats. The proposal to simply apply timing stipulations to these areas as under the Preferred Alternative is insufficient because it allows construction of wellpads and roads known to be deleterious to wintering sage grouse inside these key habitats as long as construction/drilling occurs outside the winter season, and further allows production-related activities throughout winter. Thus, the sage grouse may return to their winter habitats to find an industrialized, fragmented habitat that no longer has any habitat function due to the birds' avoidance of such areas.
001	Studies to be reviewed by BLM	000037	We strongly urge the BLM that potential Critical Habitats should be withdrawn from future oil and gas leasing, allowing existing leases to lapse as they expire. Existing leases should have all measures approved under the RMP revision applied as Conditions of Approval. BLM should close potential Critical Habitats, regardless of development potential, to future oil and gas leasing as a means of steering future land uses away from conflict in the future. In addition to other protections, Timing Limitations need to be applied to all drilling and other permitted industrial activities in potential Critical Habitats. Impacts from industrial projects are in no way limited to exploratory drilling or construction, and all such activities should be restricted to non-critical seasons within potential Critical Habitats, as under the Lander RMP restrictions on "surface disturbing and disruptive activities." In this regard, Timing Limitation provisions should be paired with the substantive restrictions on leasing, well density, surface disturbance density, and setbacks contained in the National Technical Team recommendations (NTT 2011).
001	Studies to be reviewed by BLM	000038	Sage Grouse Protections for Existing Mineral Leases. BLM has the legal authority to impose additional protections for species such as the Gunnison sage grouse on existing mineral leases through Conditions of Approval, protections beyond those contained in lease stipulations. This Plan Amendment is an appropriate vehicle for beefing up the inadequate regulatory mechanisms that currently exist with regard to oil and gas development.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000039	Adequate No Surface Occupancy Buffers Around Leks are Needed Protecting sage-grouse leks and associated nesting and brood-rearing habitat are key to conserving the species. Unfortunately, the state's Rangewide Conservation Plan only recommends protective buffers of 0.6 miles around leks in designated core habitat; this corresponds to a 6% probability of lek persistence (Apa et al. 2008). No scientific study has ever recommended a 0.6-mile radius for protecting breeding or nesting habitat for sage grouse. Assuming for the sake of argument that a 4-mile buffer takes in the most important nesting habitat, then by area, a 0.6-mile lek buffer protects less than 4% of the most important nesting habitat for birds using the lek.
001	Studies to be reviewed by BLM	000040	Limits on Wellsite Density are Needed. Scientific research has determined that one energy site per square mile is the density threshold at which significant impacts to sage-grouse populations begin to be measured (Copeland et al. 2013).
001	Studies to be reviewed by BLM	000042	All potential Critical Habitats should be found unsuitable for coal leasing under the RMP amendment in order to prevent direct destruction of sage grouse habitats through strip mining and indirect impacts from grouse being driven away from otherwise suitable habitats adjacent to mine sites and associated access roads and facilities by increased industrial activity. BLM should therefore find Critical Habitats unsuitable for surface mining for coal in order to provide regulatory certainty.
001	Studies to be reviewed by BLM	000043	Given the limited latitude that agencies have to regulate projects under the 1872 Mining Law, potential Critical Habitats should be recommended for withdrawal from locatable mineral entry. We are particularly concerned about the potential for uranium extraction, be it underground, strip mining, or through uranium in situ drilling and extraction methods.
001	Studies to be reviewed by BLM	000044	As with fluid minerals, BLM should close all Priority Habitats to nonenergy leasable minerals leasing, as this does little to hinder minerals production but much to assure that adequate regulatory mechanisms are in place to address threats to sage grouse persistence.
001	Studies to be reviewed by BLM	000045	There are abundant opportunities for salable minerals extraction outside sage grouse habitats, and therefore all priority and general habitats should be closed to salable mineral operations in order to foster sage grouse population maintenance and recovery.
001	Studies to be reviewed by BLM	000046	Wind and Geothermal Energy Development. Potential Critical Habitats should be exclusion areas for these types of energy development to provide adequate regulatory mechanisms to prevent major impacts to Gunnison sage grouse and their habitats.
001	Studies to be reviewed by BLM	000048	BLM should restrict noise to no more than 10 dBA above an ambient level of 22 dBA throughout occupied breeding and nesting habitat.

Submission Number	Remarks	Comment Number	Comment
008		000007	Wherever possible, work with willing sellers to retire as many leases as we can afford, and designate new reserves on public land where recreation and roads will be excluded.
011		000002	Therefore, we recommend the BLM not lease or develop parcels with high densities of Gunnison Sage-grouse, since the co-mingling of energy development and Sage-grouse habitat protection results in indirect and direct adverse effects to Sage-grouse.
015		000003	Will there be a stipulation for allowing development in areas if private property is purchased and set into conservation easements to offset for disturbed areas?
015		000008	In areas that have private surface and federal minerals how does the BLM plan to regulate this. Once a claim has been staked according to the mining laws, the minerals belong to the claimant.
015		000009	What will be the minimum distance from lecks that will be required for development?
015		000010	What will be the minimum distance from nests that will be required for development to happen?
015		000027	How will the new regulations affect existing mineral rights and oil and gas leases that are being held?
017		000002	*Leasing Stipulations and Operating Constraints*- We recommend that the design features, mitigation measures, and other conservation measures that will be utilized to protect the Gunnison sage-grouse and its habitat be described in the Draft EIS. We further recommend that the document identify the mechanisms that will be used to establish and enforce these measures. For example, it may be appropriate to establish conservation measures to be imposed as leasing stipulations on future mineral development leases. Where leases have already been issued or for other types of activities on public lands that do not require a lease, it may be appropriate to include conservation measures as permit conditions.
020		000009	The EIS should consider closure and withdrawal of especially critical lands from location, leasing or sale under the mineral laws;
021		000003	We are seriously concerned about the restrictions in BLM IM 2014-100, particularly unjustifiable leasing closures and buffers around leks, and recommend that BLM refrain from including any of those instructions in any alternatives in the revised RMPs.
021		000005	BLM must recognize that oil and natural gas operators can develop resources across the range of the GuSG in an environmentally responsible manner by protecting local populations and habitat while providing the nation with an abundant source of affordable energy.

Submission Number	Remarks	Comment Number	Comment
021		000010	We are seriously concerned about the restrictions in BLM IM 2014-100, particularly unjustifiable leasing closures and buffers around leks, and recommend that BLM refrain from including any of those instructions in the revised RMPs. The restrictions in the IM are based on a broad one-size-fits-all management approach that fails to consider state, county, and local plans and efforts to protect GuSG and its habitat. Based on the restrictions outlined in BLM IM 2014-100 and the NOI we are concerned that BLM may ultimately violate Section 363 of the Energy Policy Act of 2005, which requires federal land management agencies to ensure that the least restrictive stipulations are utilized to protect resource values. Accordingly, we recommend that BLM adhere to the law and apply the least restrictive stipulation from the alternatives in the EIS and RMP amendments, which is not represented by the management approach outlined in the IM.
021		000011	A decision to discontinue leasing in all occupied habitat areas would unreasonably block access on adjacent non-federal lands and to significant energy resources on thousands of acres of public lands. Closing all leasing in a large area for one species clearly does not balance GuSG protection with economic, jobs, and energy security concerns.
021		000013	In the IM, BLM requires FOs to "prohibit surface disturbing activities and disruptive activities within four miles of active leks from March 1 through June 30 subject to valid existing rights and emergency repairs of ROWs" and "avoid surface disturbance within mapped winter habitat for GUSG (if not mapped, within four miles of active leks)" BLM IM 2014-100 at 5. This unneeded seasonal restriction will greatly limit year-round development and its associated benefits, which include reduced truck traffic, fewer emissions, and phased development.
021		000018	Oil and natural gas development activities must not be prohibited or otherwise subjected to a moratorium during the planning process. Amending an RMP does not provide an opportunity to suspend oil and natural gas operational decisions.
021		000019	Specifically, we are concerned that language in BLM IM 2014-100 invites the potential violation of valid existing rights. (citing BLM IM 2014-100 at 8) BLM IM 2014-100 at 9. BLM should not impose conservation measures or restrictions that would provide the same or greater restrictions on activities that would be applied under the ESA, at the expense of valid existing lease rights. BLM cannot legally impose new NSO stipulations or COAs on existing lease rights that differ from those entered under the original contractual terms. See Utah v. Andrus, 486 F. Supp. 995, 1011 (D. Utah 1979). See, e.g. National Wildlife Federation, 150 IBLA 385, 403 (1999). Based upon the above legal requirements of FLPMA, BLM cannot approve management prescriptions that may impair, block access to, or render uneconomic existing federal oil and natural gas leases.

Submission Number	Remarks	Comment Number	Comment
021		000029	The revised RMPs and associated EIS must include sufficient exceptions, modifications and waivers for qualifying actions and clear and concise criteria for which they may be granted. Oil and natural gas operators should have ample opportunities to apply for exceptions, modifications, and waivers from restrictions in the final RMPs/EIS based on site specific considerations, including but not limited to the actual presence of GuSG and its habitat within a project area. Reasonable exception, modification and waiver criteria provide much needed operational flexibility and should be granted if applicable.
023		000015	RESOURCE DEVELOPMENT Resource development is vital to the economy of the region and can impact GuSG. Local government has worked with the State and BLM to avoid, minimize, and mitigate impacts from resource development in critical habitat. For example, any site disturbance within GuSG occupied habitat within Gunnison County requires review by the County Wildlife Conservation Coordinator to ensure impact to the GuSG is avoided, minimized or mitigated. The BLM is requested to consider GuSG management strategies and their impact to the following resource development actions: a. Geothermal development b. Minerals c. Timber d. Oil and Gas e. Energy generation facilities. Several local counties have developed specific oil and gas regulations to work in tandem with Federal and State regulations to protect the species from oil and gas development. The BLM is encouraged to work collaboratively with local and state authorities to avoid, minimize or mitigate impacts from resource development on both federal and private lands. This is particularly true where there is a private land/BLM interface where resource development may be occurring.
029		000002	aim for retiring as many leases as possible and use that land to decrease fragmentation and improve habitat; this will minimize the need for lethal predator control.
030		000004	In situations where there's a split estate, we'd like to encourage all affected parties and adjacent landowners to work together to minimize effects to GUSG and its habitat. Parties should be open to creative solutions, such as locating the well-pad out of GUSG habitat and directional drilling.
030		000013	In the case of existing leases, we encourage the BLM to require appropriate stipulations to protect GUSG and its habitat at the Application for Permit to Drill stage. These mitigative measures must be clearly defined in the EIS along with when they will be applied. In addition, there should be a discussion in the EIS regarding limitations BLM may have in applying mitigative measures.

Submission Number	Remarks	Comment Number	Comment
032		000006	Valid Existing Right Once the BLM has issued a federal oil and gas lease without NSO stipulations, and in the absence of a nondiscretionary statutory prohibition against development, the BLM cannot unilaterally deny development on existing leaseholds. We recommend that BLM provide a concise explanation of what constitutes valid existing lease rights and how they relate to new land use decisions. We also recommend that BLM clearly state in the Draft Environmental Impact Statement (DEIS) that the new restrictions proposed will not apply to lands already under oil and gas lease. Moreover, it must be acknowledged that BLM has no authority to impose these new restrictions through Conditions of Approval (COA) on applications for permit to drill (APD) if they would abrogate the valid existing lease rights. Once a lease has been issued, stipulations may not be legally modified absent voluntary agreement by the lessee. Therefore, in accordance with 43 CFR 3101 and federal case law, we recommend that BLM clearly disclose its limited authority to add conditions of approval to a drilling permit, i.e., conditions must remain consistent with the terms of the issued lease. These principles are particularly important given the fact that new protections identified in a draft RMP could very much impose significant limitations on existing leases that were not anticipated at the time the leases were acquired from the federal government in good faith. Such qualifiers are consistent with current rules and policies of the BLM and must be clearly disclosed in the planning documents. We recommend that Colorado BLM use language similar to that used in the 2008 Pinedale RMP, which clarifies that "Existing oil and gas or other mineral lease rights will be honored. When an oil and gas lease is issued, it constitutes a valid existing right; BLM cannot unilaterally change the terms and conditions of the lease . . . Surface use and timing restrictions from this RMP cannot be applied to existing leases." Pinedale RMP, pg. 2-19.
032		000007	Least Restrictive Stipulations Section 363 of the Energy Policy Act of 2005 (EPAct) requires federal land management agencies to ensure that lease stipulations are applied consistently and to ensure that the least restrictive stipulations are utilized to protect the resource values to be addressed. BLM's existing policy states "the least restrictive stipulation that effectively accomplished the resource objectives or uses for a given alternative should be used." Moreover, it is important for BLM to demonstrate that less restrictive measures were considered but found insufficient to protect the GUSG. A statement that there are conflicting resource values or uses does not justify the application of restrictions. Discussion of the specific requirements of a resource to be safeguarded, along with a discussion of the perceived conflicts between it and oil and gas activities must be provided. Clearly, an examination of less restrictive measures must be a fundamental element of a balanced analysis and documented accordingly in the DEIS.

Submission Number	Remarks	Comment Number	Comment
032		000008	Impact Analysis and Advanced Drilling Techniques Previous impact analyses contained in planning documents have relied upon outmoded drilling practices previously utilized by the oil and gas industry. In recent years, industry has focused its efforts on developing technology which significantly reduces its footprint on the landscape. These technological advances must be fully acknowledged by BLM during preparation of its impact analysis of current and future activities within GUSG and other wildlife habitats. For example horizontal and directional drilling practices have been shown to substantially reduce well densities, disturbances and habitat fragmentation. In fact, one horizontal well can replace as many as 16 vertical wells. Consequently, development of one square mile with horizontal wells can be accomplished with only one or two pads. Recognition of these new practices must be an integral part of BLM's analysis. In addition, BLM needs to fully recognize that there are varying degrees of disturbance during the development and production phases of oil and gas resources. For instance, the highest level of surface disturbance occurs during the construction, drilling and completion phases, which is limited to one or two days up to a few months, depending upon the time it takes to complete the well. Once production ensues, these activities subside dramatically and only regular monitoring and maintenance of the well are required. Shortly after well completion, the operator generally begins interim reclamation to restore any impacted habitat that isn't being used. This interim reclamation remains in effect until the well has been depleted. Upon conclusion of production activities, the operator will then move forward with plugging and abandonment procedures, which also includes final reclamation that will ultimately result in full restoration of the site and its return to productive habitat. These factors must be fully considered by BLM in its analysis.
032		000012	BLM must honor valid existing rights, BLM must use the least restrictive lease stipulations needed to protect the GUSG, BLM must fully recognize advances in drilling technology
037		000010	***Recommendations***: We recommend that the BLM use the MLPs under consideration, as well as some of those proposed that overlap with important sage-grouse habitat, as a way to fulfill the purposes of this planning effort, and incorporate them into the analysis of alternatives.
037		000014	As part of developing management for these areas, a careful review of the adequacy of protection afforded to production area habitat in the Gunnison Basin is needed. For Occupancy (NSO) buffers around leks as its primary means of protection for greater sage-grouse. However, this buffer has consistently been scientifically shown to be inadequate to maintain lek activity (Holloran 20053, Walker et al. 20074).

Submission Number	Remarks	Comment Number	Comment
037		000016	Evaluate and address indirect effects as part of addressing infrastructure siting. For example, oil and gas development includes direct loss of habitat from well pad and road construction, as well as indirect disturbance effects from increased noise and vehicle traffic. The geographic area of indirect influence can be harder to quantify but potentially much larger in scope than direct effects. Recommendations: BLM should develop and implement an approach for siting allowable infrastructure within Gunnison sage-grouse habitat that minimizes both direct and indirect effects.
037		000017	Incorporate clear standards for waivers, exceptions and modifications or permitting activities in avoidance areas. Lease stipulations. To the extent BLM is permitting ongoing leasing in Gunnison sage-grouse habitat, such as through use of no surface occupancy stipulations, the RMP Amendment should set out specific standards for granting such changes. Recommendations: Standards incorporate in this amendment should include: * The authority to alter the implementation of such stipulations would be subject to approval by the State Director, depending on the location of the proposed use, category of stipulation and type of alternation, as well as compliance with additional conditions set out below. • Approvals would be granted only after consultation with state wildlife agencies and the U.S. Fish and Wildlife Service (FWS). If the affected state wildlife agency or FWS raises concerns that cannot be addressed, then approval must be obtained from the State Director. • Public notice and an opportunity for comment will be required prior to granting waivers, exceptions and modifications. • Quarterly reports regarding exceptions, modifications and waivers requested and the basis on which any were granted should be compiled and published by the Colorado and Utah BLM State Directors and submitted to the Director.
040		000002	a proposed gravel mining operation in actual sage-grouse habitat is being considered. This poses an immediate threat for the survival of this unique species.
041		000012	Delta County requests that the BLM consider GUSG management strategies and their impact to coal, geothermal development, minerals, timber, oil and gas and energy generation facilities.
055	Mentions Monticello-Dove Creek and San Miguel Basin sub populations	000003	Energy development and associated infrastructure on new and existing leases, power lines, cables, wind turbines, communication towers and other structures have the potential to directly and indirectly negatively impact GuSG populations. Currently, these activities pose the largest risk in the Dove Creek/Monticello and San Miguel populations.

Submission Number	Remarks	Comment Number	Comment
055		000012	In general, CPW believes that exemptions, waivers, or modifications should be avoided when associated with protective standards and conservation measures for GuSG. In the context of lease stipulations, CPW recognizes the importance of allowing for exemptions, waivers or modifications in rare, very clearly defined circumstances. When necessary, exemptions, waivers or modifications should be balanced with appropriate mitigation of equal or greater conservation value for GuSG. We recommend that the BLM consult CPW prior to granting exemptions, waivers and modifications within the range of GuSG in Colorado.
055		000015	CPW encourages the BLM to include an analysis of potential noise impacts and propose standards for limiting noise disturbance to GuSG in this EIS. In part, CPW requests that BLM develop noise standards and stipulations that address noise emissions from individual facilities such as access roads, compressor stations, pump jacks, diesel motors, etc., as well as standards for cumulative noise emissions that address issues such as well pad density and road placement in relation to mapped GuSG habitats.
055		000016	Another disturbance not specifically identified or addressed in existing or draft RMPs is the impact that rig lighting, natural gas flaring, above ground power lines and production facility lighting may pose to GuSG. Flaring is believed to pose a threat from several standpoints. Noise associated with flaring may cause disturbance, increase predator effectiveness and may directly interfere with lek display vocalizations and harmonics. Light from rigs, flaring, and production facilities can extend far beyond the immediate pad area, and this increased availability of light may provide increased opportunity for predation at times when natural light is normally not available. Light may also directly preclude grouse from using lek sites or other seasonal habitats.
055		000018	The EIS analysis should fully explore solar, wind, biomass, and geothermal resources in the context of threats and potential impacts to GuSG. CPW requests that BLM provide a robust investigation of future alternative energy development potentials and their resultant impacts.
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife	000007	Close priority sage-grouse habitat to gas and oil leasing, and within four miles of active leks. Generally do not allow any new surface occupancy on federal leases within priority habitat during any time of the year. Allow exploration within priority sage-grouse habitats to gather information for areas outside of and adjacent to priority habitat. Apply a seasonal restriction on exploratory drilling in priority habitat, prohibiting surface disturbing activities during nesting and brood-rearing seasons. Find all sage-grouse priority habitat as unsuitable for surface coal mining. Grant no new leases for subsurface coal mines unless all surface disturbances occur outside of priority sage grouse habitat. Abate all wastewater from oil, gas and goal extraction to manage the risk of West Nile virus.

Submission Number	Remarks	Comment Number	Comment
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife	000008	Do not site wind energy development in priority sage grouse habitat, or within 5 miles from active sage-grouse leks. Site wind energy at least four miles away from the perimeter of sage-grouse winter habitat.

Table 7 - Comments pertaining to Fish and Wildlife

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000005	Text on Affected Environment with regard to sage grouse habitat must discuss the winter habitat needs of the birds, in light of clear scientific evidence that impacts to sage grouse by oil and gas development on winter ranges can have profound effects on the birds (Walker 2008). Walker, B. L. 2008. Greater Sage-grouse Response to Coal-bed Natural Gas Development and West Nile virus in the Powder River Basin, Montana and Wyoming, USA. Ph.D. Dissertation, Univ. Montana. Missoula, MT.
001	Studies to be reviewed by BLM	000022	Riparian areas are critical to maintaining sage grouse populations, and these areas are often heavily impacted by cattle. We are concerned that overgrazing by cattle in undeveloped riparian areas, and in proximity to range improvements such as fences and watering sites in and near springs and riparian areas are having significant negative impacts on sage grouse brood-rearing habitats. Water troughs and other range developments also have the potential to harbor *Culex tarsalis* mosquitoes, which carry West Nile virus; this is a potentially serious threat to sage grouse. The BLM's grazing policies and practices should discourage the concentration of cattle in the riparian zone to protect sage grouse brood-rearing habitats.
001	Studies to be reviewed by BLM	000035	Connectivity Areas, which may fall outside potential Critical Habitats, are of crucial importance to sage grouse. Connectivity Areas need to be established to connect Priority Habitats.
001	Studies to be reviewed by BLM	000036	it is critically important for BLM to identify and protect winter concentration areas. The location of these habitats must be mapped and fully disclosed in the EIS. These lands, once identified under the RMP amendment, should be withdrawn from future mineral leasing and entry of all kinds, with Conditions of Approval applying NSO stipulations inside and within 2 miles of these areas, disturbance limits of 3% per square mile and one wellpad per 640-acre section, exclusion of overhead powerlines, and seasonal road closures within the winter habitats. The proposal to simply apply timing stipulations to these areas as under the Preferred Alternative is insufficient because it allows construction of wellpads and roads known to be deleterious to wintering sage grouse inside these key habitats as long as construction/drilling occurs outside the winter season, and further allows production-related activities throughout winter. Thus, the sage grouse may return to their winter habitats to find an industrialized, fragmented habitat that no longer has any habitat function due to the birds' avoidance of such areas.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000041	Land surface disturbance in sage-grouse habitat is well known to affect the species. Disturbance thresholds are commonly applied in areas of energy development, even though there has been limited science to date establishing the disturbance threshold by percentage of land area at which significant impacts to sage grouse begin to occur. The NTT report recommends managing priority sage-grouse habitat so that discrete anthropogenic disturbances cover less than three percent of any single square-mile section regardless of ownership (NTT 2011 at 7). Furthermore, once the three percent limit is reached, additional surface-disturbing projects are precluded (with no exceptions in cases where off-site mitigation projects are undertaken), and in cases where the three percent limit is already exceeded, restoration must occur to meet this threshold under the NTT recommendations. This should be applied on a per-square-mile-section basis, as recommended by the NTT.
001	Studies to be reviewed by BLM	000048	BLM should restrict noise to no more than 10 dBA above an ambient level of 22 dBA throughout occupied breeding and nesting habitat.
008		000003	Resist the strong pressures to resort to lethal predator control when there are other options. Shotgun approaches to protection will have much undesired collateral damage, and give folks the impression that "something is being done," when in fact, science does not support the desired outcomes.
008		000005	make liberal use of seasonal closures in breeding season.
010		000002	impacts to nests by crows.
011		000004	We support identification and avoidance as an effective landscape level strategy for managing Gunnison Sage-grouse habitat on BLM administered lands in the project area because identification and avoidance will also provide an effective landscape level strategy for protecting cultural resources.
015		000002	Will the regulations allow for improving habitat in areas adjacent or around large population centers of the birds to offset areas that will be affected by development?
018		000002	Instead, we urge the BLM and the USFWS to examine other causes of the declining population of the sage-grouse. We believe that encephalitis, West Nile and Western Equine virus could potentially be to blame for a part of the declining population. These viruses are not uncommon in Colorado. The viruses are spread through the mosquito variety found in Colorado and other western states and the birds then act as a reservoir for the virus. The sage-grouse's habitat is shared with these agents. A study of the bird's blood titter could provide the necessary answers.
018		000003	no studies have been applied to determine predator impact on the Gunnison sage grouse. These studies should include predators which devour eggs, as well as young and adult birds. The Gunnison sage-grouse shares its habitat with a numerous variety of predators that have been growing in numbers.

Submission Number	Remarks	Comment Number	Comment
020		000003	Protection of GUSG habitat from disturbance must be a priority. First, mating grounds (leks) must be buffered from disturbance by energy development, roads, transmission lines, traffic, habitat manipulation, ORV use, and other activities. On federal lands, adequate buffers around leks must be identified and limitations on activities there must be implemented. No-surface-occupancy buffers of from 4 miles to 6.2 miles around the lek have been suggested to protect leks and nesting of greater sage grouse; in the absence of specific information about GUSG lek buffers these figures could be used (See "Conserving the Greater Sage Grouse" by the Center for Biological Diversity, American Bird Conservancy and Wildearth Guardians for specific references).
020		000005	Third, methods to protect and restore wintering grounds for the GUSG should be evaluated in the EIS. Fourth, the EIS should include discussion of identification and creation of corridors of habitat to connect areas of occupied habitat and potential occupied habitat, the kinds of measures that could be taken to reunite areas of suitable habitat, whether occupied or unoccupied, and how fragmentation of habitat can be prevented.
020		000008	Predator control should be carefully evaluated; usually it does not help meet conservation goals in the long term and is often expensive as well as useless.
021		000012	We are extremely concerned about language in BLM IM 2014-100 regarding a four-mile buffer around leks and urge BLM to refrain from including a buffer this size or larger in any alternative in the EIS. We urge BLM not to rely on such speculative restrictions and reconsider the use of a four-mile buffer around leks. Further, given the topography of the planning area, there is substantial acreage within four miles of leks that is not suitable GuSG habitat.
021		000013	In the IM, BLM requires FOs to "prohibit surface disturbing activities and disruptive activities within four miles of active leks from March 1 through June 30 subject to valid existing rights and emergency repairs of ROWs" and "avoid surface disturbance within mapped winter habitat for GUSG (if not mapped, within four miles of active leks)" BLM IM 2014-100 at 5. This unneeded seasonal restriction will greatly limit year-round development and its associated benefits, which include reduced truck traffic, fewer emissions, and phased development.
021		000026	The application of conservation measures for GuSG should be limited to occupied areas. We disagree with the FWS' proposal to designate unoccupied areas as critical habitat and do not believe BLM should follow suit by applying conservation measures in areas that are not occupied by GuSG.

Submission Number	Remarks	Comment Number	Comment
023		000011	ADOPT A MITIGATION HIERARCHY We ask that BLM utilize the following hierarchy for the protection of the species: 1. Avoidance: Avoidance of impacts in occupied habitats. 2. Minimization: Minimization when avoidance of impacts is not feasible. 3. On Site Mitigation: On-site rectifying of impacts (i.e. repairing, rehabilitating, or restoring the impact area) when avoidance or minimization of impacts is not possible. 4. Off Site Mitigation: Compensation of impacts by replacing or providing equivalent conditions off site. This is the last priority where avoidance, minimization or onsite mitigation is not possible. And, compensation of impacts should be required only in the instance of a "major federal action".
030		000001	Consider requiring fence markers on new fences located near leks and encouraging the placement of fence markers on old fences near leks and other places that pose a high risk of collision (Stevens 2011).
030		000002	Regarding unoccupied proposed critical habitat, we ask that the BLM work in conjunction with the FWS, San Miguel County and other appropriate agencies/experts to verify and ground-truth the suitability of the proposed, but currently unoccupied habitat. All habitat where there has been recent occupancy should be treated as occupied. In fact, we believe all historic unoccupied habitat should be treated as occupied as that is the desired future condition. Please see a copy of the comments, attached, that San Miguel County sent to the US Fish and Wildlife Service on this topic.
030		000018	We suggest also considering: disease, e.g., West Nile Virus. Where water improvements are being considered, there should be conditions of improvement that mitigate the potential for WNV transmission and connectivity among populations and subpopulations
032		000009	BLM Must Limit Management Objectives to Suitable Habitat USFWS has significantly overestimated the historic distribution of GuSG in its listing proposal. This exaggeration of historic distribution has resulted in a significant overstatement not only of habitat loss and fragmentation but also its associated impact. Upon review of the GUSG Conservation Assessment contained in the Rangewide Plan, of the 1.7 million acres proposed for critical habitat designation by the USFWS, 766, 462 acres are completely unsuitable habitat and are not occupied by the GUSG. The historic distribution portrayed in the listing proposal includes extensive landscapes that are decidedly non-habitat. Due to their unsatisfactory features, such as soils incompatible for sustaining sage-brush and the concentration of pinyon-juniper, it is highly unlikely these unsuitable areas will ever have any meaningful capacity to support GUSG populations. We strongly recommend that BLM limit its planning decisions to the suitable, occupied habitat documented in the Rangewide Plan because its identification is based upon 10 years of site-specific research and mapping efforts. It would be unjustified to arbitrarily expand protection zones to unsuitable or potential future habitat that may never be able to sustain a viable GUSG population.

Submission Number	Remarks	Comment Number	Comment
037		000006	Where inventoried LWCs are not currently being managed as "natural areas," the value of these lands for Gunnison sage-grouse should still be evaluated.
037		000008	For the purposes of the Gunnison sage-grouse EIS, BLM should assume roadless lands adjacent to Wilderness Study Areas that overlap with mapped occupied Gunnison sage- grouse habitat in the Gunnison Basin and in potentially suitable habitat for the satellite populations likely provide important habitat resources for Gunnison sage-grouse and should analyze these potential LWCs for Gunnison sage-grouse conservation opportunities.
037		000015	In addition, evidence presented by Oyler-McCance, et al. (20055) indicates that although there is limited gene-flow between grouse populations, the San Miguel Gunnison sage-grouse population may serve as an important conduit for genetic movement to the outlying population. Therefore, given that these populations are dwindling and likely experiencing inbreeding depression, management decisions should focus on maintaining habitat between the large Gunnison Basin sage-grouse population and the smaller satellite populations, particularly San Miguel, to support genetic movement and recovery.
042		000008	The EISs and SEISs must analyze the impact of predation as a cause of decline for the GUSG.
045		000002	I recommend a staged approach something like this: • With the cooperation of USFWS empirical baseline populations should be established. • Buffer zones in which habitat disturbance is minimized should be defined around known leks. • Things initially prohibited in buffer zones should include: ◦ Surface disturbance – particularly anything that would negatively impact sage. ◦ High structures that could serve as perches for predators. ◦ Recreation. ◦ Anything that generates excessive noise. • Biologists familiar with the needs of GUSG (or other species of Sage-grouse if data on the GUSG are not available) should be consulted to establish appropriate initial sizes for buffer zones. It may be that, based on the opinions of qualified biologists, different buffer zones should be established for different activities. However, in all cases, the largest recommended size should be used for each type of buffer zone. • Consideration should be made for establishing buffer zones in both time and space. For example, some activities might be disallowed during critical times in the GUSG's breeding cycle, but allowed at other times. • GUSG populations should be monitored. If populations remain stable or increase, limited experiments should be conducted to see if modest reductions in the sizes buffer zones have negative impacts on populations. If populations decrease, buffer zones should be expanded. • For active GUSG habitat outside of buffer zones, BLM should adopt a cautious, staged approach to allowing anything could have a negative impact on habitat.

Submission Number	Remarks	Comment Number	Comment
048		000002	The mapping of seasonal habitats will be critical in the future to ensuring utilities such as Tri-State is able to route lines to the greatest extent feasible outside of crucial habitat for GUSG. Another critical factor that coincides with the habitat mapping is the determination of what the limiting factors are to any given population of GUSG. In some areas, it is recognized that the importance of specific limiting factors may be unknown. Uncertainties should be documented in the analysis and acknowledge that management directives may change as better information becomes available. The cumulative effects analysis should also be supported by sound science applicable to the type of activity or facility under evaluation.
048		000009	Recent data has documented poor effectiveness in perch discouragers and greater effectiveness of covers for preventing electrocutions (see Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 [APLIC 2006], pages 17-18). Perch discourager research has shown limited effectiveness in eliminating perching from power line structures. In areas where raven predation on sage-grouse nests is a concern, certain types of perch discouragers may aid in the accumulation of nest material (APLIC 2006), and could potentially increase raven predation pressure due to nest construction on discouragers in sensitive areas. It is critical that the BLM work closely with the utilities to select a perch discourager that will not result in avian electrocutions, increased nesting substrate for corvids, or a device that affects the ability of the line crews to safely conduct their maintenance operations.
048		000010	A number of researchers have investigated the effectiveness of various perch deterrent products. Researchers have consistently found that it is difficult, and perhaps impossible, to deter all perching by raptors and corvids. When recommending perch deterrents it is also critical to understand the structure configuration proposed for the power line. On the whole, use of perch discouragers requires careful consideration based on site-specific factors, such as the type and height of structure, topography, line-of-sight, and distance to and type of sage-grouse use areas. It is also imperative that the land manager considers the presence of alternate perches in the surrounding landscape.
049		000002	BLM should focus on managing occupied habitat until a final decision has been made on unoccupied habitat. Unoccupied, proposed critical habitat has not been well vetted or finalized.
049		000005	BLM should utilize the following hierarchy for the protection of the species: • Avoidance of impacts in critical habitats. • Minimization when avoidance of impacts is not possible. • On-site rectifying of impacts (i.e. repairing, rehabilitating, or restoring the impact area) when avoidance or minimization of impacts is not possible. • Compensation of impacts by replacing or providing equivalent conditions off site. This is the last priority where avoidance, minimization or onsite mitigation is not possible.

Submission Number	Remarks	Comment Number	Comment
049		000008	BLM should as well consider the effects of natural predation. The natural predators of the GuSG have increased, and this could have a devastating impact on GuSG population. In order for the GuSG to thrive, predator control must be considered on a massive scale.
050		000001	If these birds are like other grouse, they are subject ot heavy predation. There are many skunks, cayotes, bear, mt. lion, and many fox's also birds, crows, magpies, ravans and many more birds that pray on their egg's. The Sagebrush is very high, leaving little room for exit and become easy pray.
050		000003	Pay people to hatch the egg's and start families in uninhabited areas.
055		000009	Due to fundamental differences in both the size of GuSG populations and the identified threats and risks, incorporating population-specific strategies to address the unique threats and risks to individual grouse populations based on local conditions will be critical.
055		000014	There are a number of mechanisms by which anthropogenic sources of noise can negatively impact grouse, including the following: • Industrial noise masks the sounds of strutting males and may disrupt female choice of males on the lek (leading to reduced productivity) and cause females (and consequently males) to abandon leks; • Industrial noise masks sounds made by approaching predators and may lead to increased predation and reduced survival for all age and sex classes in all seasonal habitats, not just at leks. Over time, this may result in reduced survival of birds inhabiting areas near noise sources and ultimately, fewer birds in developed areas. • Industrial noise in brood-rearing habitats may mask the predator-warning vocalizations given by females to chicks or the contact calls of lost chicks, either of which could lead to reduced brood survival; • Sage-grouse of all age and sex classes in all seasonal habitats may respond to increased ambient noise by increasing time spent being vigilant, thereby increasing energetic costs and decreasing time available for foraging and self-maintenance, leading to poorer body condition and reduced productivity; and • Industrial noise could cause chronic physiological stress that leads to poorer body condition and reduced survival or productivity
063		000003	Predation is excessive locally and is also a sizable contributing factor on lack of birds in this area.
063		000005	If the local area of SW CO topography would harbor masses of Sage Grouse, they would already be here and they are not. I personally have never seen a Sage Grouse in the area and my living elders cannot remember seeing any either. Just because there is sage brush here, that does not dictate good potential for the species to thrive here, as there are many more factors that dictate quality of potential. Aerial imagery cannot justify potential alone.

Submission Number	Remarks	Comment Number	Comment
063		000006	The climate in the Southwest and predation are the main causes for the Sage Grouse not able to flourish in this area and coupled with the general poor quality of potential for the region, it does not dictate a good potential for the area for any reason what so ever. This part of the Southwest has always been and always will be extremely arid.

Table 8 - Comments pertaining to Livestock and Grazing

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000010	The Colorado Public Lands Health plan amendment offers some benefit to sage grouse, and should be carried forward. The Gunnison sage grouse RMP amendment should include strengthened conservation measures in the context of livestock grazing that ensure that permitted grazing activities (including forage removal, appurtenant structures, and permitted activities) have no negative effect on Gunnison sage grouse and their proposed Critical Habitat areas.
001	Studies to be reviewed by BLM	000011	In order to minimize the spread of cheatgrass, livestock forage removal limits need to be set under the RMP amendment, allowing no more than 25% of the available forage to be consumed each year. Widespread devastation of rangeland (and more pertinently to this amendment, sage grouse habitat) and loss of habitat value can be wrought by this invasive weed. BLM must restore degraded habitats by managing for elimination of cheatgrass from the system.
001	Studies to be reviewed by BLM	000012	Given that fencing is a major cause of collision mortality for sage grouse, the use of fencing for rotational grazing should be discontinued, and allotments with fences within designated sage grouse habitat should have their fences removed.
001	Studies to be reviewed by BLM	000013	BLM should require the fencing off of natural springs with buck-and-pole fences (to reduce collision mortalities) and place livestock water sources outside the fences rather than at the spring itself. If past actions have dried up natural springs or wetlands to create stock tanks, then remedial action should be required return some water to ground for sage grouse and vegetation, in an area protected from livestock.
001	Studies to be reviewed by BLM	000014	For allotments where sage grouse nesting is known to occur, shifting on-off dates (if necessary) could minimize the chances of impacts to nesting sage grouse, and livestock drives should be routed to avoid sage grouse leks during the strutting and nesting seasons.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000015	We encourage BLM proposal to implement the following measures for grazing; these standards should be supplemented with measurable benchmarks to ensure strong rangeland health. Incorporate sage grouse habitat objectives and management considerations into all BLM grazing allotments immediately upon approval of the RMP amendment. Work cooperatively on integrated ranch planning so operations with deeded/State/BLM and/or USFS allotments can be planned as single units. Prioritize completion of land health assessments and processing grazing permits in potential Critical Habitat. Focus this process on allotments that have the best opportunities for conserving, enhancing, or restoring habitat for sage grouse. Utilize ESDs to conduct land health assessments to determine if standards of rangeland health are being met. Conduct land health assessments that include (at a minimum) indicators and measurements of structure/condition/composition of vegetation specific to achieving sage grouse habitat objectives. If local/state seasonal habitat objectives are not available, use sage grouse habitat recommendations from Connelly et al. (2000) and Hagen et al.(2007).Develop specific objectives to conserve, enhance, or restore potential Critical Habitats based on BLM ESDs and assessments (including within wetlands and riparian areas). If an effective grazing system that meets sage grouse habitat requirements is not already in place, analyze at least one alternative that conserves, restores, or enhances sage grouse habitat in the NEPA document prepared for the permit renewal. Manage the potential Critical Habitats as ACECs for vegetation composition and structure consistent with ecological site potential and within the reference state to achieve sage grouse seasonal habitat objectives. During drought periods, prioritize evaluating effects of the drought in greater sage grouse Core Habitat Areas relative to their needs for food and cover. Since there is a lag in vegetation recovery following drought, ensure that post-drought management allows for vegetation recovery that meets sage grouse needs. Manage wet meadows to maintain a component of perennial forbs with diverse species richness relative to site potential (e.g., 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. Where riparian areas and wet meadows meet proper functioning condition strive to attain reference state vegetation relative to the ecological site description. Reduce hot season grazing on riparian and meadow complexes to promote recovery or maintenance of appropriate vegetation and water quality. Use fencing/herding techniques or seasonal use or livestock distribution changes to reduce pressure on riparian or wet meadow vegetation used by sage grouse in the summer. Avoid grazing and trailing within lekking, nesting, brood-rearing, and winter habitats during periods of the year when these habitats are used by sage grouse. Analyze springs, seeps, and associated water pipelines to determine if modifications are necessary to maintain the continuity of the predevelopment riparian area. Make modifications where necessary, considering impacts to other water uses when such considerations are neutral or beneficial to sage grouse.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000016	In addition to these standards, for sage grouse Priority and General Habitats there should be a decision procedure and actions described below, depending on habitat conditions. 1. Assess which lands meet the Connelly el al. (2000) guidelines both in riparian areas and upland areas in Table 3. Include the conservation community and grazers in this assessment. 2. For those not meeting these guidelines, determine that the allotment does not meet rangeland health standards. To meet these standards, the sagebrush community must meet or exceed the height and percent canopy cover percents for sagebrush, native grasses, and forbs in Table 3 (Connelly et al. 2000). 3. Change grazing use as necessary so that upland and riparian areas have a positive 2 or better Grazing Response Index (GRI) score for allotments not meeting standards. 4. For allotments that meet standards, insure grazing practices produce a "0" or plus net GRI score. 5. In sage grouse nesting areas, do not allow grazing until after the 20th of June (Braun 2006). 6. During permit renewal, inventory the amount of forage produced in the allotment, assess the allotment ecological conditions, and document past grazing use. As a part of permit renewal, conduct a range capacity analysis to assess the stocking rate for the allotment. Stocking levels for allotments that meet standards should lead to less than 25% utilization (Braun 2006) and for allotments not meeting standards, less than 15% utilization. 7. For allotments not meeting the rangeland health standards, prohibit grazing during a severe or worse droughts as defined by the national drought monitor. 8. For allotments that meet the standards, reduce grazing use prior to a drought to utilization levels less than 10-15% utilization for forage expected during the drought. 9. In sage grouse habitats, produce an annual end-of-season report for each allotment. This report should note the planned grazing use for the season, note the grazing use that occurred, report the results of any monitoring, document precipitation/drought information, describe any projects completed, and note successes or problems encountered. These should include conservation community and grazer information and be posted on the web.
001	Studies to be reviewed by BLM	000017	According to the Conservation Objectives Team (COT 2013: 45), the following objective should be a guiding principle: Conduct grazing management for all ungulates in a manner consistent with local ecological conditions that maintains or restores healthy sagebrush shrub and native perennial grass and forb communities and conserves the essential habitat components for sage grouse (e.g. shrub cover, nesting cover).
001	Studies to be reviewed by BLM	000018	If livestock grazing standards await the renewal of grazing permits for implementation, the necessary improvements could be delayed for years, to the detriment of sage grouse and their habitats. The RMP Amendment should specify that increased protections will apply immediately to existing permits upon completion of the planning process.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000019	The RMP Amendment should also provide for voluntary permit retirement in potential Critical Habitat on a willing-permittee basis. In addition to enshrining the consideration of livestock permit retirement on a voluntary basis in the RMP amendment, The Taylor Grazing Act gives federal agencies the authority to re-examine and reclassify lands within a grazing district that are "more valuable or suitable for any other use" than for grazing livestock. 43 U.S.C. § 315(f). The BLM's sage grouse plan amendment process provides an ideal vehicle for the Secretary to make a new determination that all existing sage-grouse habitat (or a subset of extant habitat – e.g., preliminary priority habitat or preliminary general habitat) is not "chiefly valuable for grazing," and thus modify existing grazing districts to excise these areas. Through this same process, the Secretary may separately determine that these same areas are "chiefly valuable" for sage grouse protection and conservation. This should be accomplished as part of the Gunnison sage grouse RMP amendment process.
001	Studies to be reviewed by BLM	000020	Adequate grass hiding cover for sage grouse is needed in nesting and brood-rearing habitats. Sage grouse inhabit wide-open habitats with abundant avian predators, are clumsy fliers, and rely primarily on hiding and camouflage to escape their predators. In this context, maintaining adequate grass cover in sagebrush habitat provides critical hiding cover, without which land managers tilt the scales toward the predators. The increased predation that follows is a direct result of excessive grazing and inadequate livestock management, not the predators themselves. The best available science has established that at least 7 inches of residual stubble height needs to be provided in nesting and brood-rearing habitats throughout their season of use. Thus, all available science to date is consistent with standards that maintain at least 7 inches of stubble height rangewide, and more than 10.2 inches in the Dakotas.
001	Studies to be reviewed by BLM	000021	Rest Following Fires and Treatments, and Grazing Adjustments During Drought are Necessary. It is critical that BLM rest from livestock grazing for several years all areas that have been subject to burns or vegetation treatments.
001	Studies to be reviewed by BLM	000022	Riparian areas are critical to maintaining sage grouse populations, and these areas are often heavily impacted by cattle. We are concerned that overgrazing by cattle in undeveloped riparian areas, and in proximity to range improvements such as fences and watering sites in and near springs and riparian areas are having significant negative impacts on sage grouse brood-rearing habitats. Water troughs and other range developments also have the potential to harbor *Culex tarsalis* mosquitoes, which carry West Nile virus; this is a potentially serious threat to sage grouse. The BLM's grazing policies and practices should discourage the concentration of cattle in the riparian zone to protect sage grouse brood-rearing habitats.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000024	the BLM should not rely on the placement of salt blocks as a means to draw livestock away from riparian habitats. The use of riders to herd cattle away from riparian zones has been shown to be an effective method to achieve the restoration of degraded riparian zones. A change in grazing regime may also lead to the restoration of Properly Functioning Condition in some cases. Rest from grazing can also result in the restoration of degraded riparian zones.
001	Studies to be reviewed by BLM	000027	Priority Habitats must be Exclusion Zones for New Fences, and Existing Unnecessary. Fences Must be Removed Fences used for livestock management pose a major threat to sage grouse. The BLM's National Technical Team (2011) recommended that unused fences should be removed, and their rights-of-way withdrawn. New fences should be prohibited in Priority Habitats. BLM should work toward increasing pasture size and dismantling of existing fences in sage grouse habitat to mitigate this problem.
013		000005	Colorado has a healthy and diverse grassland. This region's sage grouse production is in good shape due to decades of cooperation between ranchers and the BLM. The EIS must adequately acknowledge this condition.
014		000004	Sage-grouse are sagebrush obligates, and their populations are closely tied to the quantity and quality of sagebrush habitats, habitats that have been declining for at least the last 50 years. The single, major activity responsible for many of these changes on public lands is livestock grazing and associated activities. Livestock grazing is considered the single most important influence on sagebrush habitats and fire regimes throughout the Intermountain West in the past 140 years.[7] [7] *Krick, S. T., A L. Holmes, R F. Miller. 2005. The role of fire in structuring sagebrush habitats and bird communities. FIRE AND AVIAN ECOLOGY IN NORTH AMERICA Studies in Avian Biology, no. 30. Page 6. Cooper Ornithological Society. Boise, ID.* The potential conflict between livestock grazing and sage-grouse intensities near water sources due to the importance of these areas to sage-grouse, particularly during early brood rearing. The BLM must analyze a preferred alternative that will protect and restore sage-grouse habitat, native plants, particularly in riparian areas. This should be done, not with fencing that poses other problems for sage-grouse and other wildlife, but through reduction and removal of livestock grazing in pastures that include riparian areas.
014		000005	Since the continuous "management" of sagebrush (including chemical herbiciding, chaining, fire, and other disturbance) has led to many of the situations scientists now agree are threatening these ecosystems, BLM should select the complete removal of livestock as the preferred alternative in the RMPA/EIS.
014		000006	BLM should include residual grass requirements inside all sage-grouse habitats to be applied as automatic amendments to permit terms and conditions and Allotment Management Plans; by automatic, WWP means at the approval of the LUPA/EIS, not at the unspecified future time for sitespecific permit renewals or new allotment management plans. The new amendments must likewise limit livestock use of herbaceous forage. (citing Brava 2006)

Submission Number	Remarks	Comment Number	Comment
014		000007	Livestock grazing is a well-known vector of invasive, non-native, or noxious species colonization on public lands. Clearly, the BLM needs to consider the cause of these infestations and the contribution of domestic livestock grazing to them.
014		000008	To facilitate grazing management, BLM and the Forest Service have constructed thousands of miles of fences throughout Gunnison sage-grouse habitat, fences negatively impact sage-grouse in various ways. In addition to posing a collision risk, they facilitate the spread of exotic plants, potentially increase mortality of sage-grouse by increasing predation rates through increased perches for raptors.
014		000009	The BLM should include a quantitative estimate for the number of miles of livestock grazing fences in each resource area. The agency must consider the number and miles of roads and the extent of vertical structures within sage-grouse habitat that are part and parcel of livestock operations. The impacts of traffic near lek sites for livestock water hauling, sheep trucking operations, supplemental feeding, etc. should be analyzed in forthcoming analyses. These are all cumulative impacts of livestock operations that cause harm to sage-grouse, and without stringent mitigation protecting sage-grouse leks and nests during key parts of sage-grouse lifecycle, these activities are likely to contribute to the decline of reproductive success and lek stability and recovery.
014		000010	BLM and the Forest Service livestock grazing allotments include numerous water developments aimed at allowing livestock to graze across entire landscapes. These water developments pose additional threats to Gunnison sage-grouse that the Service should consider. Livestock waters such as stock tanks and ponds provide supplemental water for sage-grouse predators. For example, ravens are known to preferentially use s1ock tanks over natural springs in arid environments.49 Water tanks also provide opportunities for West Nile virus vectors. Spring developments may also result in dewatering of small meadows thus decreasing available brood-rearing habitat and may cause localized drying and other hydrological effects.
014		000013	Riparian areas are critical habitat for sage-grouse brood-rearing. However, 'these are some of the most manipulated and degraded habitat types in Gunnison sage-grouse range. That and climate change will place sage-grouse brooding habitat in an even more precarious position. But the most impactful stressor is livestock... The forthcoming analyses must therefore provide high levels of protection for the riparian habitats on public lands and seek to allow no net loss of this ecotype.
014		000014	If riparian areas, particularly those in PPMAs, are not meeting reference conditions due to livestock, livestock should be immediately removed until conditions improve. This should be included in forthcoming analyses as common to every alternative.

Submission Number	Remarks	Comment Number	Comment
014		000015	A recent study confirms that livestock grazing causes physiological stress to sage-grouse. Thus, the BLM should not just consider the known impacts to habitat, or the direct impacts of trampling, flushing, and nest predation, but how this wild animal is harmed by the mere presence of non-native ungulates. Research shows that when sage-grouse nests are actually monitored, trampling of nests and disturbance of nesting hens by cattle turns out to be relatively common; The BLM must consider the well-documented nest trampling, egg-crushing, predation and nest abandonment that livestock cause in determining seasons of use.
014		000018	For example, the forthcoming plan amendments must not rely on the completion of Land Health Evaluations (LHE) to protect Gunnison sage-grouse from livestock grazing impacts. There is currently no statutory requirement for the BLM to repeat LHE when it reconsiders grazing authorizations every 10 years or so no matter how stale those assessments may be, nor even when a given allotment had failed to meet standards in that stale assessment. As such, meeting the Standards and Guidelines in a LHE is an insufficient regulatory mechanism to protest sage-grouse or its habitat.
014		000019	The forthcoming proposals must explicitly link the measurements of the S&G assessments to the criteria established for sage-grouse nesting and brooding success, not wait for these criteria to be developed at some unspecified future date.
014		000020	In recent years the BLM has been reissuing ten-year livestock grazing permits without any NEPA compliant analysis and under the previous terms and conditions pursuant to various Congressional Riders. Should such unchanged permits for livestock grazing continue to be the norm, the BLM will not have any regulatory mechanisms in place to manage livestock grazing in Gunnison sage-grouse habitat even if its governing Resource Management Plans are amended. This failure to immediately incorporate specific Gunnison sage-grouse conservation measures into all ten-year livestock grazing permits in Gunnison sage-grouse habitat underlines the inadequacy of existing regulatory mechanisms. Sage-grouse need at least 7" of stubble height and 25 percent residual herbaceous vegetation to survive. This should be defined and adopted under the preferred alternatives.
014		000022	WWP supports the administrative closure of all allotments in the planning area, but every grazing alternative should allow for the retirement of grazing permits upon voluntary relinquishment. and should allow for removal of all livestock grazing infrastructure such as water developments, fences and corrals that pose threats to the birds or their habitats. This would make closure the default solution for allotments in Gunnison sage-grouse habitat.

Submission Number	Remarks	Comment Number	Comment
020		000004	Second, protection and restoration of wet meadows used by the GUSG for brood-rearing are vital and should be addressed in the EIS. We are particularly concerned about overgrazing in wet meadows, which can reduce cover, trample vegetation, and decrease the native species diversity. Conserving and restoring such habitats may require changes in grazing regimes and permit conditions in the Resource Management Units. Grazing must be addressed in depth. Retirement of grazing privileges, seasonal restrictions on summer grazing (recommendation: only between June 20 and August 1) and winter grazing (restricted to the period Nov. 15 to March 1); standards for stubble height (experts recommend a residual 7-inch residual stubble height standard for Greater sage grouse [1]); herbaceous cover requirements (Greater sage grouse experts recommend limiting the use of herbaceous vegetation by livestock to 25-30 percent [2] and [3]); evaluation of new water developments to consider mosquito breeding and West Nile virus; and marking or elimination of fencing near active leks to reduce GUSG collisions with fencing should be discussed in the EIS.
023		000013	GRAZING The BLM should consider that ranching on both private and public lands has played a critical role in the protection of the GuSG. Recent evaluation of the importance of private lands for sage-grouse has revealed that private lands provide a larger proportion of important habitats than would be indicated by simple spatial analysis. The BLM should recognize that Federal grazing leases are essential in maintaining a viable ranching community. BLM should also carefully consider the potential consequences of increased grazing pressure on private lands within GuSG habitat that would occur if additional grazing restrictions were imposed on the use of public lands. The ranching community has voluntarily placed conservation easements and conservation agreements with assurances on their properties and have played a crucial role in the protection of the species. The transition areas from sage brush to brood rearing areas (wet meadow interface) are often in the valley floors and play a critical role in providing habitat for the species. Much of this habitat in the Gunnison Basin is maintained by irrigation of hay meadows on private lands. Without the voluntary cooperation of the ranching community as mentioned above, the gains made in the population of the GuSG most likely would not have been realized. The BLM is requested to fully analyze the interrelationship of private and public lands for ranching along with existing voluntary conservation measures in the protection of the GuSG. Working cooperatively and in a coordinated fashion among private entities, local, state, and Federal land management agencies through an update of the RCP will result in the most effective approach to conserving GuSG.
030		000001	Consider requiring fence markers on new fences located near leks and encouraging the placement of fence markers on old fences near leks and other places that pose a high risk of collision (Stevens 2011).

Submission Number	Remarks	Comment Number	Comment
030		000015	In addition to ensuring that factors such as percent cover and stubble heights are met, ideally grazing should occur at the appropriate time (and for the appropriate duration) to ensure that a variety of native vegetation can thrive, e.g., cool season perennial grasses. Where lands are not meeting the Land Health Standards and grazing is identified as a causative factor, The EIS must describe what actions will be taken, in what time frame, and how progress toward remedying the conditions will be measured. In addition, to prevent erosion and de-watering of wet meadows, grazing should be managed to ensure the maximum amount of vegetation is available during peak runoff times, e.g., right before and during summer monsoons in monsoonal-driven systems.
041		000010	Specific to livestock grazing, Delta County insists that current litigation not be used to determine the sideboards or the preferred alternatives. The livestock industry brings in $24 million dollars annually to Delta County and the majority of the animals spend a portion of their grazing year on lands administered by the BLM. Livestock grazing is crucial to the economy of Delta County. The EIS should reference that there was higher numbers of GUSG when the BLM lands were stocked heavier and thus to blame livestock for the reduction is not listening to history or understanding current conditions and research. The ranching industry has played a critical role in the protection of the GUSG on public and private land. Federal grazing leases are essential in maintaining a viable ranching community and large unfragmented blocks of landscape that are not developed. BLM should carefully consider excessive regulatory pressures with additional grazing restrictions being proposed by external members of the public. Continue ratcheting down of numbers and/or time cause undo economic pressure on ranchers and this should be part of the EIS. The BLM is request to fully analyze the interrelationship of private and public lands for ranching along with existing voluntary conservation measures in the protection of the GUSG. The full range of alternatives should include an increase in AUMs and not concentrate on only reductions.

Submission Number	Remarks	Comment Number	Comment
042		000001	Livestock grazing contributes positively to the above primary principles, IM No. 2012-043, being both compatible with and beneficial to GUSG habitat conservation. Ranchers are the stewards of the GUSG habitat on both the private and public land they use. Without ranchers, who provide an effective line of defense against fire and noxious weeds, manage forage for optimum production, and are the primary protectors of open space in the private lands of the west, large areas of greater sage-grouse habitat would be in jeopardy. The benefits provided by ranching relate directly to several identified threats to GUSG habitat, including wildfire, invasive plants, and urbanization and development. As recognized by the BLM in IM No. 2012-043, grazing can be "used as a tool to protect intact sagebrush habitat and increase habitat extent and continuity which is beneficial to [the] Greater Sage-Grouse and its habitat." The IM continues, "Given the potential financial constraints in addressing the pimary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands" (emphasis added). According to the Natural Resources Conservation Service (NRCS), grazing "has been responsible for retaining expansive tracts of sagebrush-dominated rangeland from conversion to cropland" and can "stimulate growth of grasses and forbs, and thus livestock can be used to manipulate the plant community toward a desired condition." The very same can be said for the Gunnison Sage-grouse and is what occurs on the ground across the full range of the GUSG. Permitted livestock levels (animal unit months, or AUMs) have dropped dramatically on BLM and FS lands from 1940 to today. Greater sage-grouse numbers have mirrored that decline.
042		000002	Specific to LeValley Ranch and the management of our private lands, BLM allotments and National Park Service allotment: allotment: A. LeValley Ranch moved the turn on date for the Green Mountain Allotment from the first week of May to the third week of May voluntarily to accommodate the needs of the GUSG fifteen years ago. B. LeValley Ranch moves the cattle through the pastures in the spring on a deferred rotation C. Water for the guzzlers for the GUSG originate from springs on private ground held by LeValley Ranch. D. Monitoring data is collected per BLM Monitoring Handbook guidelines and includes Line intercept data for long term trend monitoring. It is our belief that local citizens working together to resolve local issues offers the best chance of success. Federal agencies should defer to those local working groups that are on the path toward achieving results and should not interfere with or conflict with the work of such groups. Any draft EIS or Environmental Assessment should identify any state or local working groups in their project areas and the work they are doing for sage grouse conservation.

Submission Number	Remarks	Comment Number	Comment
042		000003	Utilization percentages or stubble-height measurements, set forth in a formula and applicable west-wide throughout the GUSG, are not effective tools for adaptive management. Adequate residual plant cover must be determined by short-term and long-term monitoring, which includes accounting for various environmental conditions. See HR 042, pg. 3&4 "Residual, Cover, Usage" for examples. There are inherent disadvantages of inflexible, "one-size-fits-all" standards. An adaptive, case-by-case approach will ensure that efforts and resources expended in the name of GUSG conservation are well spent. Ecosystems vary; site potential, plant communities, environmental influences, precipitation patterns and plant production and vigor are highly variable and cannot be appropriately managed by single-source standards and guidelines. The regulations should give flexibility to land managers.
042		000006	Electric fences should not fall under the same specifications as permanent fences.
042		000007	Developed water sources should be recognized for the benefit they provide to the greater sage-grouse ...Thus, maintenance of water developments should not be hindered by greater sage-grouse management activities.
042		000009	As seen in many areas of successful rangeland conservation, including efforts to conserve the Gunnison Sage-Grouse, livestock grazing and habitat conservation go hand in hand. It is imperative that a stable economic environment be sustained and enhanced so that our members may assist in the conservation of rangeland for the greater sage-grouse.
045		000003	It's my understanding that cattle grazing may increase the proportion of sage among range plants. This may be good for the GUSG, or it may be that in addition to increasing sage, cattle grazing reduces other plants essential for the GUSG's well-being. For example, cattle grazing may reduce the proportion of taller grasses that the GUSG need for cover. GUSG and grazing experts should be consulted to establish an initial grazing policy. As with other policies, the grazing policy should be regularly reviewed in light of its apparent effect on the GUSG population. Perhaps different grazing policies should be tried in different regions before adopting the policy that appears to be best for the GUSG.
049		000007	The BLM should consider that ranching on both private and public lands has played a critical role in the protection of the GuSG. BLM should recognize that Federal grazing leases are essential in maintaining a viable ranching community. Much of this habitat in the Gunnison Basin is maintained by irrigation of hay meadows on private lands. Without the voluntary cooperation of the ranching community as mentioned above, the gains made in the population of the GuSG most likely would not have been realized. BLM should fully analyze the interrelationship of private and public lands for ranching along with existing voluntary conservation measures in the protection of the GuSG. Decisions regarding the management of land will have an effect on the land uses. In particular, any changes made in land use will affect ranchers with grazing permits.

Submission Number	Remarks	Comment Number	Comment
049		000009	BLM should attend to the effects of wild horses and burros located in sage-grouse habitat. While livestock grazing is often singled out as the major threat to sage-grouse habitat, the EIS should report on wild horse and burros and contain plans for how to better manage these herds and their effect on habitat areas. The plans should focus on how to effectively manage the appropriate number of horses.
053		000001	I have routinely observed cattle being permitted to graze on the Simms Mesa BLM land in December and January, and sheep being permitted to graze anywhere from February to early May. The timing of this grazing couldn't be worse with respect to the breeding and rearing needs of GUSG.
055		000006	We recommend that where Land Health Standards are not being met within an allotment BLM expedite changes in grazing management. Inappropriate livestock management can have long term negative impacts to GuSG habitat.
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife	000009	Within sage-grouse habitat, incorporate measurable sage-grouse habitat objectives and triggers for changed management into all BLM and Forest Service grazing allotments through amendments to EMPs and LRMPs, applicable to all AMPs or permit renewals. Rest at least 25 percent of each sage-grouse planning area from livestock grazing each year. Identify grazing allotments where permanent retirement of grazing privileges would potentially benefit sage-grouse restoration. Manage free-roaming wild horse and burro populations at levels demonstrated to achieve and maintain sage-grouse habitat objectives.

Table 9 - Comments pertaining to Invasive Species

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000011	In order to minimize the spread of cheatgrass, livestock forage removal limits need to be set under the RMP amendment, allowing no more than 25% of the available forage to be consumed each year. Widespread devastation of rangeland (and more pertinently to this amendment, sage grouse habitat) and loss of habitat value can be wrought by this invasive weed. BLM must restore degraded habitats by managing for elimination of cheatgrass from the system.
001	Studies to be reviewed by BLM	000033	BLM must prescribe conservation measures, including reduction in grazing intensity, to combat cheatgrass spread in the forthcoming RMP amendment.
001	Studies to be reviewed by BLM	000049	Minimizing the use of herbicides and pesticides inside sage grouse habitats, and using them as a last resort, is also a good approach for sage grouse habitats. Insects are an important food source for sage grouse; this is particularly true during the early brood-rearing phase. Pesticide use to control grasshoppers and crickets can have a negative effect on insect populations important to Sensitive Species as a food source. Although the use of Plateau in heavily cheatgrass-infested areas might be allowed in cases where sage grouse are not using the treated habitats, aerial spraying of herbicides and insecticides over or within one mile of sage grouse habitats should not be allowed. Hand spraying might be accomplished by deliberately driving grouse off by teams on foot prior to treatment, and by treating from backpack units rather than aerial or truck/ATV application.
014		000007	Livestock grazing is a well-known vector of invasive, non-native, or noxious species colonization on public lands. Clearly, the BLM needs to consider the cause of these infestations and the contribution of domestic livestock grazing to them.
030		000014	We encourage the BLM to conduct inventories of weeds in GUSG habitat and follow that up with strategies to treat weeds where needed. Ideally this should be done in coordination with adjacent landowners/agencies. Prevention of noxious weed infestations should be encouraged through education and the requirement that BLM staff, permitees, leasees, etc. follow BMPs. Revegetation with grouse- appropriate native species (ideally local ecotypes) should be a requirement for oil and gas companies, power companies, and other land disturbing activities.

Table 10 - Comments pertaining to Lands and Realty/ROWs

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000047	Priority Habitats need to be designated based on the habitats that sage grouse populations need to survive, not on the routing preferences of transmission line operators, and these Priority Habitats must include sufficient protections to keep such transmission lines at least 0.25 miles away from all occupied sage grouse habitats.
008		000007	Wherever possible, work with willing sellers to retire as many leases as we can afford, and designate new reserves on public land where recreation and roads will be excluded.
015		000025	What will be the maximum height of structures to be allowed on federal ground in the affected areas? What restrictions will there be on rights of way through public land to private properties? How will you address property owners rights of access during critical times of years? Will projects submitting plans of operations be required to shut down at certain points during the year? How does the blm plan to allow access to individuals or companies that have valid rights in areas on public lands? Will road construction or utility construction be restricted?
016		000003	City of Gunnison Electric Service Territory and E911 Communication System - On June 14, 1962 the PUC published Decision 58736 establishing the service territory for the City of Gunnison. The majority of the City's electric service territory is on private property but some of the overhead transmission lines are on federal land. The city service territory includes Tenderfoot Mountain where numerous communication towers are located - electrical service to these towers will need to be continued. It is possible that other tower service sites for Gunnison - Hinsdale Counties E-911 communications may need to be considered in the near future and these sites would likely be on federal lands administered by the BLM. The existing and future E-911 communication facilities are critical to local emergency services and the fulfillment of basic community life-safety needs. The City purchases electricity from the Western Area Power Administration (WAPA) who is responsible for the management of the Colorado River Storage Project, and from the Municipal Energy Agency of Nebraska. The Colorado River Storage Act (April II, 1956). the Secretary of the Interior is hereby authorized (I) to construct, operate, and maintain the following initial units of the Colorado River storage project, consisting of dams, reservoirs, power plants, transmission facilities and appurtenant works: Curecanti, Flaming Gorge, Navajo (dam and reservoir only), and Glen Canyon." The Curecanti (Aspinall) Unit of the Colorado River Storage Project includes the Blue Mesa, Morrow Point and Crystal dams. Numerous high voltage transmission lines of this unit traverse across the basin and through critical Sage-grouse habitat. These power generation and transmission line facilities provide electric power to a significant portion of the western United States. The ongoing maintenance of these facilities is essential for meeting regional energy demands that are linked to the nation's long term security needs. Existing utility lines in the City's electric service territory encompasses occupied and critical sage grouse habitat. The need to develop new transmission lines outside of the City boundary will be limited to the defined service territory and is anticipated to be fairly minimal. However, the need for maintenance of the

Submission Number	Remarks	Comment Number	Comment
			existing lines will be required in perpetuity. Providing reliable electric supply to customers within the City's service territory is mandated by the Colorado PUC and it is an essential factor for maintaining the long term health, safety and welfare of the community.
020		000011	In evaluating measures to conserve GUSG habitat, attention needs to be given to the reaction of the birds to vertical structures like telephone poles, wind turbines, etc. Greater Prairie Chickens, close relatives of the GUSG, are negatively influenced by the presence of trees [4]. GUSG may also be negatively impacted by the placement of vertical structures in their habitat, as these provide perches for raptors which may prey on the GUSG.
021		000027	In the RMP amendments, we urge BLM to incorporate sufficient exception, modification, and waiver criteria for the construction of rights-of-way and the routing of above-ground transmission or distribution lines within occupied habitat. If site-specific NEPA analysis can demonstrate that such activities will not negatively impact local populations or if affected habitat is not actually occupied by GuSG, designation of rights-of-way or construction above-ground transmission or distribution lines should be allowed.
024		000004	Will the new sage-grouse planning process protect grouse from electrical transmission projects?
029		000003	restrain extractive activities and curtail construction of future transmission projects.
037		000016	Evaluate and address indirect effects as part of addressing infrastructure siting. For example, oil and gas development includes direct loss of habitat from well pad and road construction, as well as indirect disturbance effects from increased noise and vehicle traffic. The geographic area of indirect influence can be harder to quantify but potentially much larger in scope than direct effects. Recommendations: BLM should develop and implement an approach for siting allowable infrastructure within Gunnison sage-grouse habitat that minimizes both direct and indirect effects.
037		000018	Recommendations: Large-scale projects, such as transmission lines, should not be permitted and should be explicitly excluded. For smaller scale projects, avoidance should be required unless BLM has considered alternative locations outside of Gunnison sage-grouse habitat and documented why they are not feasible, and a detailed mitigation plan is incorporated and implemented for impacts to habitat and other resources.
038	Mentions Poncha Pass Sub-population	000003	In the fall of 2013 and the spring of 2014, 30 GUSG fitted with radio collars from the Gunnison Basin were transplanted to Poncha Pass and are being monitored with radio telemetry by biologists from the Monte Vista office of Colorado Parks and Wildlife (CPW). Monitoring of these transplanted birds has indicated that the three large energy transmission lines that run through sage-grouse habitat on the west side of US Highway 285 in the Poncha Pass area have a detrimental impact to sage-grouse and compromise approximately half of the available sagebrush habitat in the area. For sage-grouse, transmission lines pose a two-fold threat: powerlines are a collision hazard to grouse flying in the area and the power poles increase the risk of predation by raptors as the pole structures provide perches for hunting raptors. The Gunnison Sage-grouse Rangewide Conservation Plan

Submission Number	Remarks	Comment Number	Comment
			(RCP), published in 2005 outlines conservation strategies that should be implemented for powerlines and other utility corridors (RCP, p. 225). These strategies include burying powerlines, marking overhead lines to prevent collision, retrofit power poles to deter raptor perching, enforce seasonal timing restrictions on maintenance of utility lines, require habitat restoration due to vegetation alteration, employ weed prevention practices in disturbed areas. The proximity of powerlines and power poles to leks is of special concern. At Poncha Pass some of the powerlines are within 0.6 miles of the current lek or within a mile of historic leks at Poncha Pass.
038		000004	The Poncha Pass Gunnison Sage-grouse Working Group requests that conservation strategies and best management practices specific to utility lines outlined in the RCP and CCA be included in the RMP EIS. Specifically, • All utility line maintenance activities in sage-grouse habitat should be subject to seasonal timing restrictions for access and construction consistent with spring seasonal closures for the general public. • The three utility lines should be co-located to minimize impact • Bury the co-located line to the maximum extent feasible • When burying the line is not possible install the most effective perch deterrents available on all power poles in sagebrush habitat. • When burying the line is not possible mark overhead power lines to minimize GUSG collisions. • Follow best management practices for road maintenance and ground disturbance as outlined in the CCA to prevent invasive weed introduction and spreading as well as strategies to restore disturbed vegetation. • Ensure any heavy equipment used on the project is cleaned before working in sage-grouse habitat to prevent the spread of weeds. • Except in areas where the powerline is buried, sagebrush should not be bladed or bulldozed in the project area.
044		000001	One issue that concerns me is that predation was mentioned as a cause of the GUSG decline in one of the BLM presentations. It is clear that GUSG and predators have evolved jointly, and their presence in GUSG habitat did not keep the bird from evolving. My impression is that such human-related changes in their habitat, such as tall structures including power and telephone lines and trees for predators to perch on and loss of cover, are the cause of increased predation.
048		000001	when routing and siting long linear corridors, complete avoidance of GUSG habitat is infeasible in some areas of the overall range. The availability of viable and comprehensive information and data for sage-grouse occurrence and specific habitat types is critical to ensuring our siting processes incorporate sage-grouse conservation into our short- and long-term project planning.
048		000002	The mapping of seasonal habitats will be critical in the future to ensuring utilities such as Tri-State is able to route lines to the greatest extent feasible outside of crucial habitat for GUSG. Another critical factor that coincides with the habitat mapping is the determination of what the limiting factors are to any given population

Submission Number	Remarks	Comment Number	Comment
			of GUSG. In some areas, it is recognized that the importance of specific limiting factors may be unknown. Uncertainties should be documented in the analysis and acknowledge that management directives may change as better information becomes available. The cumulative effects analysis should also be supported by sound science applicable to the type of activity or facility under evaluation.
048		000004	much of the research and resulting management recommendations relating to construction and operation disturbances (including access road effects) to grouse comes from studies are specific to oil and gas operations. It is critical that the RMP amendments recognize the differences and applies appropriate management recommendations according to facility type. One primary example is the frequency the facilities are accessed for maintenance and general operations. Once a transmission line is in operation, maintenance crews patrol the line via aerial and ground surveys once a year. They will not go back to the ROW unless repairs are necessary. Repairs may be required due to aging or failing equipment, vandalism, and severe weather events. The access road grade is left in place in the ideal situation, but the road is re-vegetated to reduce habitat impacts and soil erosion. Oil and gas roads are used frequently and are generally not reclaimed/revegetated until the facility is taken out of operation. Therefore, noise and disturbance related impacts should be assessed accordingly.
048		000005	Tri-State requests that the BLM address in the DEIS the critical lack of information and research on the effects of tall structures on GUSG. Based on our knowledge and extensive research, no peer reviewed studies have been conducted on the impact of tall structures specifically to GUSG.
048		000007	Tri-State would request that the EIS acknowledges that future research is required to determine effective temporal and spatial buffers and setbacks that will mitigate impacts to GUSG populations from power lines. Buffer guidance should be considered adaptive and the RMP amendment should be written to allow the BLM to modify spatial and temporal buffers as new and better information/data becomes available specific to power line construction, operation, and maintenance. The guidance should also take into account existing disturbance, topography, or land uses in the surrounding environment.
048		000008	A second issue requiring additional research is the incidence of sage-grouse collisions with power lines as well as fences. Tri-State requests that analysis in the EIS and in the future clarifies what assumptions were made in mortality assessments. Field reviews are an important part of this analysis to ensure the utility implements the appropriate mitigation strategy and can document primary sources of mortality associated with their power line operations. Tri State would encourage the BLM to contact and coordinate with Tri-State whenever mortalities are found in proximity to the line to determine the best course of action to mitigate the effect if warranted.
048		000009	Recent data has documented poor effectiveness in perch discouragers and greater effectiveness of covers for preventing electrocutions (see Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 [APLIC 2006], pages 17-18). Perch discourager research has shown limited effectiveness in eliminating perching from power line structures. In areas where raven predation on sage-grouse nests is a concern, certain

Submission Number	Remarks	Comment Number	Comment
			types of perch discouragers may aid in the accumulation of nest material (APLIC 2006), and could potentially increase raven predation pressure due to nest construction on discouragers in sensitive areas. It is critical that the BLM work closely with the utilities to select a perch discourager that will not result in avian electrocutions, increased nesting substrate for corvids, or a device that affects the ability of the line crews to safely conduct their maintenance operations.
048		000010	A number of researchers have investigated the effectiveness of various perch deterrent products. Researchers have consistently found that it is difficult, and perhaps impossible, to deter all perching by raptors and corvids. When recommending perch deterrents it is also critical to understand the structure configuration proposed for the power line. On the whole, use of perch discouragers requires careful consideration based on site-specific factors, such as the type and height of structure, topography, line-of-sight, and distance to and type of sage-grouse use areas. It is also imperative that the land manager considers the presence of alternate perches in the surrounding landscape.
048		000011	Tri-State is currently evaluating several structure configurations in GUSG habitat that will reduce the perching surface available to corvids and other raptors. The structure configuration selected for any given project is ultimately based on voltage class, electrical and engineering consideration, and ROW widths/restrictions. Another critical item to consider when selecting a structure configuration in GUSG habitat is the presence of other migratory birds. Tri-State encourages open collaboration on implementation of perch discouragers on new and existing lines to ensure the alternative selected is viable, effective, and will not result in cumulative effects to other species.
048		000012	Another mitigation approach that has been suggested in various sage-grouse management guidance documents is undergrounding power lines to remove the risk of predation and reduce habitat fragmentation. Burying high voltage transmission lines poses a significant operational challenge for utilities and would significantly increase the cost of new projects, which is then passed on to our customers. Burying a high voltage transmission line, if feasible, can increase overall project cost anywhere from 6 to 10 times the comparable costs of an overhead line. Costs incurred by Tri-State and our members are passed directly along to the rate payers. Burying a transmission line in one part of our service territory could result in the inequitable sharing of costs for sage-grouse conservation for customers outside of the overall range for sage-grouse. For this reason, Tri-State has a Board Policy that states we will only consider burying transmission lines if the landowners and/or local jurisdictions agree to pay the difference in cost from overhead construction. . This is a substantial and significant cost difference that is passed along to the rate payer. For this reason it is imperative that mitigation for sensitive species is proven to be necessary and effective. Justifying this cost to people within the Gunnison Basin would be required and scientific evidence would need to prove that overhead lines are a significant limiting factor to GUSG survival in the planning area. As was previously discussed above, we have not found that any such research currently exists for either grouse species.

Submission Number	Remarks	Comment Number	Comment
048		000013	Other factors regarding the feasibility of building an underground transmission line include longevity, maintenance and operational issues, and increased habitat fragmentation effects. Direct impacts to sagebrush habitats increase when burying a transmission line versus building an overhead line. The ROW required to construct and operate an underground transmission line is generally wider and would result in more direct impacts to sagebrush habitats, increasing habitat fragmentation for sage-grouse. It is important to consider the other resources (biological and cultural) and conservation objectives associated with burying a high voltage transmission line compared to the ground disturbance associated with an overhead line. Minimizing impacts to sagebrush habitats is identified as an agency objective, but Tri-State believes the recommendation to bury transmission lines contradicts this approach.
048		000014	Another mitigation approach periodically requested of electrical utilities involves power line re-alignments to avoid occupied sage-grouse habitats. Re-locating an existing multi million dollar facility is cost-prohibitive and may or may not be a viable option for Tri-State and its members in some situations. Re-locating a transmission line can cost millions of dollars in permitting, engineering, and construction fees. In addition, new ROWs require new easements and may impact new and or additional private landowners.
048		000019	the BLM to consider that proposed design and mitigation alternatives that may be included in the DEIS should be based on the best available science and commensurate with the documented potential level of effect. Tri-State requests that the BLM engage with members of industry to have a better understanding of utility construction and operational constraints relative to the recommended conservation measures to ensure they are reasonable and feasible given other federal and state requirements. Tri-State would like to collaborate with local BLM personnel throughout the planning area and would be willing to present a short course on electricity 101
055		000003	Energy development and associated infrastructure on new and existing leases, power lines, cables, wind turbines, communication towers and other structures have the potential to directly and indirectly negatively impact GuSG populations. Currently, these activities pose the largest risk in the Dove Creek/Monticello and San Miguel populations.
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife	000006	Generally exclude new ROWs in priority sage- grouse habitat, with some exceptions. Make general sage-grouse habitat "avoidance areas" for new ROWs. Where new ROWs are necessary, co-locate new ROWs within existing ROWs, where possible. Evaluate and take advantage of opportunities to remove, bury or modify existing power lines in priority sage-grouse habitat. Reclaim ROWs (roads, fences, wells, and other development) that are no longer in use.

Table 11 - Comments pertaining to Partnerships and Collaboration

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000015	Work cooperatively on integrated ranch planning so operations with deeded/State/BLM and/or USFS allotments can be planned as single units.
008		000002	Give a strong and precautionary place to conservation, while working with local landowners & mining companies. We can do a lot of things with scarce funds.
009		000001	However, we look forward to continued consultation regarding the proposed project and request being involved in the consultation process with local governments, tribes and other consulting parties in accordance with the State Protocol Agreement between the Colorado State Director of the Bureau of Land Management (BLM) and the Colorado State Historic Preservation Officer.
009		000002	In order to determine the effect of the proposed project on cultural resources, we recommend that you coordinate your National Environmental Policy Act (NEPA) studies with the studies required under Section 106 of the National Historic Preservation Act (Section 106).
011		000001	The Hopi Cultural Preservation Office supports effective planning across landscapes, and we request consultation on any proposal with the potential to adversely affect prehistoric cultural resources in the project area.
012		000007	As was the case in 2005, BLM should support and participate in the amendment of the GuSG Rangewide Conservation Plan. This plan could provide specific guidance to amending applicable RMPs.
015		000021	How much input will the states and counties have in making these new regulations?
016		000002	*Public access to federal lauds administered by the BLM.* According to the Candidate Conservation Agreement for the Gunnison sage-grouse, Centrocercus minimus (CCA), three public recreation areas on federal lands administered by the BLM have been specifically identified. These areas include the Hartman Rocks Recreation Area; the Signal Peak Recreation Area; and the VanTuyl Ranch Recreation Area. It should be noted that while the City is not a party to the CCA, most of the primary trail-heads serving these recreation areas are located on City owned property and/or originate within the city boundary - the Hartman Rocks base area is jointly owned by the City and Gunnison County. Specific considerations for managing access and seasonal closures of these recreation areas must be directly coordinated with the City of Gunnison.

Submission Number	Remarks	Comment Number	Comment
019		000007	**The support of private land owners is critical to the protection of the species.** Application of best available science will have a significant impact on developing and sustaining support of private land owners for the conservation measures and LUPA amendments. CPW has effectively partnered with these lands owners for protection of the species with conservation easements and other voluntary partnerships with landowners. ORBA believes that overly cautious or strict application of these standards to try and improve populations must be viewed cautiously. ORBA notes that many of the habitat areas are privately owned and estimates place approximately 50% of habitat areas under private ownership. ORBA is aware that loss of support for management of these habitat areas in response to overly strict management standards being applied to public lands adjacent to these private lands would be a significant negative impact to the species.
020		000002	A group similar to the Greater Sage Grouse National Technical Team, if not already in existence, should be created ASAP to assemble existing scientific data on the GUSG and recommend management prescriptions that would support GUSG conservation. To ensure consistent conservation goals, a Conservation Objectives Team, like that formed for the Greater Sage Grouse, could be formed for the GUSG. However, the recommendations of the Greater Sage Grouse NTT and COT teams already exist and could be used to fill the breach while measures specific to GUSG are created. Formation of these teams, if it occurs, should not take time and money away from restoration efforts!
021		000007	BLM should defer to state and local GuSG efforts instead of a one-size-fits-all federal approach. There are myriad efforts, plans, regulatory mechanisms, and other actions to conserve and protect GUSG and its habitat, which should drive BLM's management of the species, rather than recommendations in BLM IM 2014-100.3
021		000030	The agency must also make a concerted effort to meaningfully engage a wide array of other stakeholders in this planning process, beyond just the consideration of public comments. To ensure the planning process is fully informed by those who will be impacted by future GuSG management restrictions, we recommend that BLM form a collaborative technical stakeholder team consisting of state and federal agencies, impacted industries, counties, conservation groups, landowners and others to develop a strategy to clearly define and inform and help guide this planning effort.

Submission Number	Remarks	Comment Number	Comment
023		000003	Local Conservation Efforts. The BLM Instruction Memorandum (IM) providing interim guidance for protecting important habitat across the range of the GuSG recognizes that local cooperation is essential for measurable conservation of the species. Conservation works best when implemented at the most local level possible. This should be factored into the framing of alternatives in the EIS. We invite the BLM to continue to work with private land owners, local governmental agencies, and state agencies to protect the GuSG through a preferred alternative that embodies a cooperative and integrated approach of public and private land management. BLM should build on two decades of successful local, state and federal government and private landowner cooperation to protect the GuSG. This approach will support the enhancement and sustainability of the GuSG populations on both public and private lands so the species continues to be stable and healthy over time.
023		000016	PRIVATE LAND/BLM INTERFACE The BLM is encouraged to work cooperatively with local and state authorities to avoid, minimize or mitigate impacts to the GUSG from activities occurring at the interface of BLM administered and private lands. Activities within this interface area which could cause adverse impacts to occupied habitat on public and/or private lands may include, but are not limited to: a. Private land development (residential, commercial, industrial) b. Planning and permitting of surface activities on BLM administered lands c. Corridor planning including utilities and transportation d. Noxious weed management
023		000018	The science supports continued local, state, and Federal collaborative efforts to protect the species in that the current rangewide population trend of Gunnison Sage-grouse has increased over the past 3 years. An updated BLM RMP along with an updated RCP would result in a significantly higher level of cooperation with private land owners and local agencies in taking measures to conserve the species. This approach will result in continued gains in the conservation of the species, as demonstrated in Gunnison County, and avoid unnecessary economic impacts to the regional economy.
027		000002	The decline in the numbers of the sage-grouse is directly related to the increase in the number of predators in our area. I have seen more coyotes and foxes in the middle of the day in the past ten years than ever before. I had never seen a mountain lion until the last five years although we saw tracks so knew they were around. Crows, ravens, and magpies are notorious for eating eggs from other bird's nests, and their are hundreds of these birds around our farm so I'm sure they are also around the BLM areas where there is active leks. Some level of predator control must be considered in the amendment process so this will need to be worked out with both the BLM and CDPW agencies.
029		000001	a collaborative approach with ranchers and landowners and not-for-profit environmental groups (e.g., The Nature Conservancy, Defenders of Wildlife, Environmental Defense Fund, Rocky Mountain Wild, etc.) to conserve and protect habitat.

Submission Number	Remarks	Comment Number	Comment
030		000004	In situations where there's a split estate, we'd like to encourage all affected parties and adjacent landowners to work together to minimize effects to GUSG and its habitat. Parties should be open to creative solutions, such as locating the well-pad out of GUSG habitat and directional drilling.
030		000005	We agree that it's important to collaborate with Cooperating Agencies, GUSG Working Groups, and other organizations/agencies. It is especially critical to communicate and take a multi-jurisdictional approach when working on county or other lands that are adjacent to BLM land.
030		000009	We appreciate this planning consideration and consider it very important. We encourage the BLM to look at the San Miguel Basin Gunnison Sage-grouse Conservation Plan (2009), available at: http://sanmiguelgrouse.org/conservation-plan
030		000012	While we agree with taking advantage of FWS and CPW data and expertise, we also believe it's important to take advantage of the expertise of the staff in the NRCS, U.S. Forest Service, and members of local GUSG Working Groups.
033		000002	This planning process should continue to build upon local, state and! federal government and private landowner cooperation to protect the GuSG.
036		000001	The County specifically requests that BLM give full consideration to the effects management actions proposed for inclusion in the Resource Management Plans may have on private lands adjacent to BLM managed lands. We encourage BLM to work cooperatively with local and state authorities to avoid, minimize or mitigate any such effects.
037		000021	Recommendations: BLM should acknowledge the role of ongoing efforts and ensure that they are incorporated into this planning effort and considered in environmental analysis.
041		000003	Delta County encourages the BLM to continue to work with private land owners, local governmental agencies, and state agencies to protect the GUSG through a preferred alternative of cooperative management and not become punitive to anyone entity. The local working groups across the entire population have been working for the last twenty years and population trends in 4 of the 7 GUSG groups have increased which clearly shows that the local effort has yielded in desired results. Alternatives detailed in the EIS should not punish, hamper or reduce the local effort. It is important for all to realize that the range wide population goal of greater than 4,600 GUSG have been met and exceeded in the last 3 years. The local efforts have resulted in the majority of habitat being managed primarily for the GUSG. This would not have happened without the cooperation of the local effort and it must be stressed that this should not be hindered in the EIS alternatives. Last and certainly not least, private landowners, local governments and State of Colorado have invested $31 million dollars since 1995 in the GUSG and associated habitat.
041		000009	The EIS needs to recognize all of the initiatives that are currently being used to protect the species and habitat including easements, !!-County, 2 State groups, Candidate Conservation effort and Agreement.

Submission Number	Remarks	Comment Number	Comment
042		000002	Specific to LeValley Ranch and the management of our private lands, BLM allotments and National Park Service allotment: allotment: A. LeValley Ranch moved the turn on date for the Green Mountain Allotment from the first week of May to the third week of May voluntarily to accommodate the needs of the GUSG fifteen years ago. B. LeValley Ranch moves the cattle through the pastures in the spring on a deferred rotation C. Water for the guzzlers for the GUSG originate from springs on private ground held by LeValley Ranch. D. Monitoring data is collected per BLM Monitoring Handbook guidelines and includes Line intercept data for long term trend monitoring. It is our belief that local citizens working together to resolve local issues offers the best chance of success. Federal agencies should defer to those local working groups that are on the path toward achieving results and should not interfere with or conflict with the work of such groups. Any draft EIS or Environmental Assessment should identify any state or local working groups in their project areas and the work they are doing for sage grouse conservation.
042		000005	In accordance with the Memorandums of Understanding (MOUs) between Public Lands Council (PLC) and both BLM and FS, (WO 220-2004-0 and NO. 09-SU-11132421-171, respectively), the agencies should work cooperatively with permittees to collect data and accept monitoring data collected by permittees.
048		000003	Tri-State requests that the BLM include electric utility industry representatives in this communication process, in order to collaborate on the siting of electrical transmission corridors (i.e., based on system needs), upgrades of existing facilities, and ongoing operation and maintenance of these facilities, while incorporating sage grouse conservation.
048		000008	A second issue requiring additional research is the incidence of sage-grouse collisions with power lines as well as fences. Tri-State requests that analysis in the EIS and in the future clarifies what assumptions were made in mortality assessments. Field reviews are an important part of this analysis to ensure the utility implements the appropriate mitigation strategy and can document primary sources of mortality associated with their power line operations. Tri State would encourage the BLM to contact and coordinate with Tri-State whenever mortalities are found in proximity to the line to determine the best course of action to mitigate the effect if warranted.
048		000011	Tri-State is currently evaluating several structure configurations in GUSG habitat that will reduce the perching surface available to corvids and other raptors. The structure configuration selected for any given project is ultimately based on voltage class, electrical and engineering consideration, and ROW widths/restrictions. Another critical item to consider when selecting a structure configuration in GUSG habitat is the presence of other migratory birds. Tri-State encourages open collaboration on implementation of perch discouragers on new and existing lines to ensure the alternative selected is viable, effective, and will not result in cumulative effects to other species.

Submission Number	Remarks	Comment Number	Comment
048		000018	Tri-State would also encourage the BLM to partner with the local working groups and land trusts to identify habitat restoration projects that would be available to applicants working in GUSG habitat. This approach is currently under way for the lesser prairie-chicken across its range. Having potential mitigation options identified early on in the planning process will facilitate a more efficient NEPA process and would allow BLM biologists to prioritize what mitigation is available and would be the most beneficial for GUSG.
048		000019	the BLM to consider that proposed design and mitigation alternatives that may be included in the DEIS should be based on the best available science and commensurate with the documented potential level of effect. Tri-State requests that the BLM engage with members of industry to have a better understanding of utility construction and operational constraints relative to the recommended conservation measures to ensure they are reasonable and feasible given other federal and state requirements. Tri-State would like to collaborate with local BLM personnel throughout the planning area and would be willing to present a short course on electricity 101
049		000001	BLM should build on two decades of successful local, state and federal government and private landowner cooperation to protect the GuSG. This approach will support the enhancement and sustainability of the GuSG populations on both public and private lands so the species continues to be stable and healthy. Conservation works best when implemented at the most local level possible. The state believes BLM must work with the local communities to create community and range-wide plans sufficiently flexible to: • Incorporate emerging GuSG research, • Adjust management practices when necessary, • Manage for different ecological conditions across the range, • Recommend or suggest reasonable formal regulatory controls, and • Foster wide-spread voluntary conservation efforts.
049		000012	The BLM is again encouraged to work cooperatively with local and state authorities to avoid, minimize or mitigate the impact to the GUSG from the following activities where there is proposed activity that may impact the GuSG where there is a private land/BLM interface: • Private land development • Utilities • Water Infrastructure • Transportation Related Considerations

Submission Number	Remarks	Comment Number	Comment
055		000020	CPW believes that BLM and the Colorado Oil and Gas Conservation Commission (COGCC) should closely coordinate the final adopted EIS outcomes. Coordination is important so that the COGCC oil and gas Rules, as amended by House Bill 1298 and the July 2009 agreement entitled *Memorandum of Understanding Among Bureau of Land Management, Colorado State Office, U.S. Forest Service, Rocky Mountain Region, and Colorado Oil and Gas Conservation Commission Concerning Oil and Gas Permitting on BLM and NFS Lands in Colorado* are consistent. Concurrent habitat designations can provide an avenue for BLM and COGCC to commit to consistent protective measures within these habitat designations that would result in greater certainty for oil and gas operators working with federal and state regulatory agencies and enhanced conservation of GuSG.
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife.	000005	Require that each tiered resource management and forest plan adopt the conservation measures prescribed in the EIS. Consult with western states about their desired hunting seasons for sage-grouse.

Table 12 - Comments pertaining to Planning and the Planning Process

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000002	We appreciate that BLM is now amending its Resource Management Plans across the range of the Gunnison sage grouse to address this deficiency. We would also urge the federal government to include Forest Service lands that have occupied or potential habitats to be included in this Plan Amendment process.
001	Studies to be reviewed by BLM	000004	We recommend the adoption of the Sage-grouse Recovery Alternative for the Gunnison Sage-grouse RMP Amendment; this blueprint was explicitly analyzed in detail and considered for adoption in 8 of the 15 Greater Sage-grouse RMP Amendments, which demonstrates unequivocally that it is a reasonable alternative
001	Studies to be reviewed by BLM	000005	Text on Affected Environment with regard to sage grouse habitat must discuss the winter habitat needs of the birds, in light of clear scientific evidence that impacts to sage grouse by oil and gas development on winter ranges can have profound effects on the birds (Walker 2008). Walker, B. L. 2008. Greater Sage-grouse Response to Coal-bed Natural Gas Development and West Nile virus in the Powder River Basin, Montana and Wyoming, USA. Ph.D. Dissertation, Univ. Montana. Missoula, MT.
001	Studies to be reviewed by BLM	000006	BLM Sensitive Species policy imposes additional requirements to provide baseline information. For BLM Sensitive Species, the agency is responsible for "Determining, to the extent practicable, the distribution, abundance, population condition, current threats, and habitat needs for sensitive species, and evaluating the significance of BLM-administered lands and actions undertaken by the BLM in conserving those species. The baseline information procured as a result of Sensitive Species Manual compliance should be included in the EIS.
001	Studies to be reviewed by BLM	000007	BLM should assure that the plan amendment meets FLPMA unnecessary or undue degradation standards by preventing impacts from permitted activities to Gunnison sage grouse.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000008	The U.S Fish and Wildlife Service will consider the Policy for Evaluating Conservation Efforts ("PECE Policy") as the yardstick to determine the adequacy of existing regulatory mechanisms when considering whether listing is warranted. The requirements to qualify for consideration under the PECE policy are as follows: The certainty that the conservation effort will be implemented 1. The conservation effort; the parties to the agreement or plan that will implement the effort; and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.2. The legal authority of the parties to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.3. The legal procedural requirements necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.4. Authorizations (e.g. permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the parties to the agreement or plan that will implement the effort will obtain these authorizations.5. The type and level of voluntary participation (e.g. by private landowners) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the parties to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation.6. Regulatory mechanisms (e.g. laws, regulations, ordinances) necessary to implement the conservation effort are in place.7. A high level of certainty is provided that the parties to the agreement or plan that will implement the conservation effort will obtain necessary funding.8. An implementation schedule (including completion dates) for the conservation effort is provided.9. The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan. The certainty of effectiveness 1. The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.2. Explicit incremental objectives for the conservation effort and dates for achieving them are stated.3. The steps necessary to implement the conservation effort are identified in detail.4. Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.5. Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.6. Principles of adaptive management are incorporated. 68 Fed. Reg. 15115. BLM should craft its RMP Amendment standards to meet the USFWS PECE Policy requirements of scientifically demonstrated effectiveness and certainty of implementation, in order to address the 'inadequacy of regulatory mechanisms' identified by the Service in its proposed listing rule for the Gunnison sage grouse.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM Cites IM 97-118, BLM H-160101 App C at 5, BLM Manual 6840.06	000009	We expect BLM to comply with all of these policy directives in crafting its Gunnison sage grouse plan amendment. (Letter cites IM 97-118, H-1601-1 App C @ 5, BLM Manual 6840)
001	Studies to be reviewed by BLM	000018	If livestock grazing standards await the renewal of grazing permits for implementation, the necessary improvements could be delayed for years, to the detriment of sage grouse and their habitats. The RMP Amendment should specify that increased protections will apply immediately to existing permits upon completion of the planning process.
001	Studies to be reviewed by BLM	000019	The RMP Amendment should also provide for voluntary permit retirement in potential Critical Habitat on a willing-permittee basis. In addition to enshrining the consideration of livestock permit retirement on a voluntary basis in the RMP amendment, The Taylor Grazing Act gives federal agencies the authority to re-examine and reclassify lands within a grazing district that are "more valuable or suitable for any other use" than for grazing livestock. 43 U.S.C. § 315(f). The BLM's sage grouse plan amendment process provides an ideal vehicle for the Secretary to make a new determination that all existing sage-grouse habitat (or a subset of extant habitat – e.g., preliminary priority habitat or preliminary general habitat) is not "chiefly valuable for grazing," and thus modify existing grazing districts to excise these areas. Through this same process, the Secretary may separately determine that these same areas are "chiefly valuable" for sage grouse protection and conservation. This should be accomplished as part of the Gunnison sage grouse RMP amendment process.
001	Studies to be reviewed by BLM	000023	Riparian areas should be the focus of monitoring efforts, as these areas can become ecologically impaired before upland habitats begin to show signs of damage. The federal agencies need properly functioning riparian areas to provide adequate brood-rearing habitat for sage grouse.

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000050	Lands with Wilderness Characteristics. This planning amendment addresses the protection of sage grouse habitats across southwest Colorado and eastern Utah, therefore directly affecting the naturalness and outstanding opportunities for primitive and unconfined recreation. It therefore requires consideration of an alternative that would protect wilderness characteristics pursuant to BLM Manual 6320.06. The designation of new Lands with Wilderness Characteristics ("LWCs") under BLM inventories in the planning area represents significant new information that must be addressed here. BLM must disclose the acreage and location of Lands with Wilderness Character that overlap with sage grouse occupied habitats, and any acreage or identity of LWCs and Priority or General Habitats should be disclosed in the Affected Environment section of the EIS. How many acres of LWCs overlap with potential Critical Habitat? How many of these acres would be protected by withdrawing Priority Habitats from oil and gas leasing and other surface-disturbing activities, and setting limits on industrial incursions on existing leases/claims under each alternative? The EIS must address lands not designated for protection of wilderness resources through the land-use planning process to date. The plan amendment should further designate all LWCs falling within sage grouse habitats to preserve their naturalness, solitude, and outstanding opportunities for primitive and unconfined types of recreation. Such protections would directly address threats that have been identified as threatening the persistence of sage grouse, such as infrastructure. This would confer addition protections on key sage grouse habitats, further buttressing the agency effort to apply adequate conservation measures for the bird.
001	Studies to be reviewed by BLM	000051	Rely First on Avoidance, then on Minimization, and only then on Mitigation. We are concerned that many (if not most) off-site mitigation projects have failed to demonstrate an increase in Gunnison sage grouse populations to compensate for the known losses of habitat loss, fragmentation, and disturbance. BLM should not use off-setting mitigation as a pretext for waiving habitat protections that would otherwise be applied. Only after protective measures have been fully applied and impacts are still unavoidable should compensatory mitigation be prescribed.
004		000001	With fewer than 5000 birds remaining, on 7% of its former range, and with BLM public lands being nearly half of this grouse-occupied range, it is important that science-based species conservation measures, watershed and habitat protection, and public values guide the BLM resource management plans.
012		000002	"Regional mitigation" measures should be eliminated from analysis and consideration. Such measures would inequitably distribute the burden of conservation measures across the range and could fail to address site specific issues.
012		000003	We hereby request that BLM complete a draft EIS prior to the FWS listing decision deadline. In the event that additional time is necessary for BLM to complete the required EIS, we request that BLM assist in pursuing appropriate extensions of the deadline for the listing decision.

Submission Number	Remarks	Comment Number	Comment
012		000006	Due to significant uncertainty surrounding unoccupied habitat, alternatives developed as part of this EIS process should focus on management of occupied habitat.
012		000008	Socioeconomic considerations should be given equal consideration as other inputs in any alternatives. Given the geographic range of the Gunnison Sage-grouse, recreation, grazing and subsurface resource development should be expressly considered. This is necessary to assure NEPA compliance and continued multiple use of BLM administered lands.
013		000003	Management of these lands for multiple-uses including reasonable motorized use allows the greatest enjoyment of these lands by the widest cross-section of the public to continue. These lands are designated as multiple-use lands. We ask that management for sharing of these lands for continued multiple-use be selected as the preferred alternative.
013		000004	Every BLM and Forest Service planning action has resulted in less motorized access and motorized trails. We are very concerned about the perception of a federal agencies with a stated commitment to equal program delivery. We urge the BLM and Forest Service to address this significant issue by developing a preferred alternative based on no impacts to motorized access and motorized recreation.
013		000006	The EIS should include an analysis of the importance of this public-private partnership to the sage grouse. Please explore things the FS and BLM can do to strengthen this partnership by keeping ranches economically viable. When amending the RMPs, please protect Colorado from any changes in land management. Instead, this region's land use traditions should be used as a model for sage grouse conservation and restoration elsewhere.
013		000011	The preparation of the document must work hard to avoid "confirmation bias. Confirmation bias is a tendency to favor information that confirms an individual's or group think preconceptions or hypotheses regardless of whether the information is true (http://en.wikipedia.org/wiki/Confirmation_bias). Only studies with negative motorized conclusions have been cited. The evaluation should have included a broad screening of issues, information, data, opinions, and needs so that it is not based on confirmation bias and meets NEPA procedural requirements. One important component required to avoid confirmation bias is the inclusion of OHV and other motorized recreationists on the inter-disciplinary team. OHV recreationists must be included on the inter-disciplinary team to help avoid confirmation bias.

Submission Number	Remarks	Comment Number	Comment
013		000016	We strongly oppose components of the 2010 Conservation Measures that lack the flexibility to adapt to local management issues. The plan amendments should avoid inflexible management standards. Rather than impose a inflexible, broad-brush management prescription for the Grouse, we suggest the BLM adopts a "landscape specific" approach to minimize the impacts on both the Grouse and the recreating public. For example, we oppose the provision mandating that any "anthropogenic disturbances" cover less than 3% of the total sage grouse habitat. Without any flexibility, the implementation of this standard on the ground will be extremely difficult. Indeed, the agencies may be forced to restrict activities that have been found to have little to no impact on the grouse.
013		000022	This strategy "in no way expands the review authority of any state agency". Significant new requirements will be required before projects are approved and no timelines are given to these agencies. Timelines for review need to be clearly established and followed if this document is to be accepted. This document seems to have expanded authority in order to accomplish its directive. We oppose any expansion of that authority.
013		000023	A contractor bidding work would have no idea of the amount of mitigation required by the permitting agency. We would like some more definition of ratios of mitigation to be in this document. Who would take responsibility for the mitigation and/or set a directive on how the mitigation should be done. For example, with our OHV group, we are not wildlife biologists. The responsibility should not be placed on groups such as ours.
013		000025	Permits will include requirements for mitigation that promote genetic diversity, critical connectivity, and population viability. This is new language for industry. What agency would come up with these requirements and when would we see them?
013		000027	Permitting- The agency has a role of consultation, recommendation and facilitation. Reasonable timelines need to be established for completion of these functions.
013		000028	Implementation - the formation of Sage Grouse Oversight Team is concerning since we aren't sure if a balance of competing interests will serve on the team. The make-up of the team needs to include a process where it will fairly include all interests.
014		000001	BLM's proposal to incorporate consistent objectives and conservation measures into nine Resource Management Plans (RMPs) in Colorado and Utah by July 2016 is commendable but based on a simlilar effort for RMPs in the range of Greater- sage-grouse, we are quite concerned with the BLM's ability and effort to incorporate meaningfull, measurable, enforceable, and science-based management provisions into these plans. [2] (citation 2: For an overview of some of the inadequacies of Greater sage-grouse RMPAs in context of livestock grazing impacts. please see WWP's report. "Ignoring the Obvious: 0verlooking the role of Livestock in the Demise of Greater Sage-Grouse and Its Habitat," available for download: http://bit.ly/l;U0DrY. Some of WWP's concerns with the broader planning effort will be raised in more detail in these scoping comments, but the report provides a "big picture" view of the problems with BLM planning west-wide, and provides recommended language to address the inadequacies of the RMPA's.)

Submission Number	Remarks	Comment Number	Comment
014		000003	Occupied habitat and potential habitat, as well as connective habitat should be afforded strict regulatory management terms and conditions, and harmful multiple-uses should be suspended pending the species' recovery. The Federal Land Policy and Management Act (FLPMA) allows, ...the balance of uses must tip away from uses that harm the species and its habitat and towards the long term existence of the species. FLPMA provides the BLM with a basis for latitude in withdrawing some uses from some public lands for the sake of future generations, and if future generations of humans are to co-exist with Gunnison sage-grouse, the preferred alternative of the EIS and the management amendments to the RMP must remove livestock grazing, among other anthropogenic stressors, from its habitat.
014		000011	The forthcoming EISs should analyze and disclose the methods BLM will consider in sage-grouse habitat and no loss of intact, high-quality sage-brush should be permitted.
014		000021	the forthcoming EIS must consider a range of alternatives that will help BLM determine allowable uses of public lands in context of recovering sage grouse and restoring sagebrush habitats. One of these alternatives must include the complete cessation of livestock grazing within the planning areas. Failing to do this would be contrary to the direction of IM MT-2012-042.
014		000023	Thus, the forthcoming NEPA analyses need to consider tile stressor of livestock grazing in context of the past, present, and potential future land uses that have occurred and will occur concurrently with any continued livestock grazing. The analyses must consider how the plan elements relate to implementation of any Gunnison sage-grouse Candidate Conservation Agreements (CCAs). The analyses must also consider the cumulative threat to Gunnison sage-grouse posed by existing and proposed energy, and oil and gas developments in combination with livestock grazing. 'The BLM should quantify existing infrastructure and development that are threats to the birds and habitats. Such cumulative threats include artificial surface waters (which increase risks for West Nile virus infection and subsidized predators, direct loss of habitat due to infrastructure, and indirect effects of infrastructure such as fencing and transmission lines. When consider the cumulative impact of other land uses in the project area, the BLM must be careful about overemphasizing mitigation measures that "could be waived" or aren't otherwise mandatory
015		000001	Will these regulations stop any kind of natural resource development in the identified areas?
015		000005	How does the BLM think its plans will be superior to what the affected counties are currently doing to keep these birds from being listed?
015		000006	FLPMA has stipulations regarding putting excessive regulations in regards to cost in its language. If the blm plans to require full plans of operation in regards to exploration activities, how does it plan to not be in conflict with FLPMA.
015		000007	How will the new regulations conform to FLPMA?

Submission Number	Remarks	Comment Number	Comment
015		000013	If there is a disagreement between private, state and federal biologists, what kind of process will there be to rectify that situation? Is the federal biologist always correct no matter the private and state biologists findings, or will there be some kind of review or mediation process where the findings are objectively looked at and a decision about validity is made? 14. Will the blm have the authority to outright reject studies performed by qualified individuals that are not federal employees? 15. How will these new rules affect the review process for projects? Will there be a definitive timeframe for review to happen, or will the review be open ended and a project may just be stuck waiting for review?
015		000014	If the state wildlife agency has stated that it does not believe the listing needs to happen, and that agency is the authority in the state, why is the blm changing its land use guidelines?
015		000015	If a project is on private property that borders blm, what kind of input will the blm have in moving forward?
015		000016	With this change, when would the blm estimate that the species will be de-listed (if it is listed). How long will the sage grouse drive the land management decisions of the blm and when will the new regulations be ammended? What process will the blm use to accomplish this?
015		000019	If the species is de-listed, will these new regulations be changed and some of the restrictions removed?
015		000020	Will the new regulations be the same for the Gunnison sage grouse and the greater sage grouse?
015		000022	When will the U.S. Fish and wildlife service publish all of the scientific evidence it will use in the decision to list or not list the species? Will the blm publish this for review as well, and will the blm publish how it is using this information in its management practices?
015		000023	How will the new regulations affect projects that are already in the review process? Will those projects be made to go back and address the new regulations? Can an in process project be rejected based on new regulations? Will projects that are already operating have to change their existing plans of operations to comply with new regulations? Can an existing project be shut down by the new regulations?
015		000024	How will the new regulations affect the intergovernmental agreement between the Colorado Division of Mining, Safety and Reclamation and the BLM in regards to exploration and mining?
015		000026	How will the new regulations change the existing requirements in submitting a plan of operation?
015		000028	Since the U.S. Fish and Wildlife began this process what has the blm done to prevent a listing of the species?

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016		000001	*EIS Scoping Timeline* An efficient process and timeline is supported by City staff, but in this case the Scoping process is significantly expedited to an unreasonable degree. The public scoping period between the Gunnison Scoping meeting on August 5, 2014 and the August 22"d deadline for scoping comments is too short to allow an opportunity to coordinate comments with the City Council. Specifically, the City is obligated to appropriately notice public meetings as required by the State of Colorado open meeting laws, and the City's policy is to discuss topics in a formal work session one week prior to a regular meeting where action by Council is taken - the Scoping timeline is too restricted to meet local review by the elected officials. The City staff believes that this short scoping timeline does not serve the public interest and detracts from the opportunity to provide meaningful and thorough comments. Also note that, due to the inability to coordinate comments with the Council because of the limited Scoping time allowance, the opinions and thoughts stated in this letter should not be construed as the policies, positions and opinions of the City Council of the City of Gunnison - this is a troubling reality of the Scoping process established by the BLM.
017		000001	*Adaptive Management* We support the BLM's intent to base the planning effort on the principles of Adaptive Management. Adaptive management is a valuable tool for protecting resources in situations where specific mitigation needs are uncertain at the project outset or may change over time. In order for adaptive management to be successful, a detailed adaptive management plan must be defined, including: • Specific timelines for periodic reviews and adjustments; • Specific criteria for determining whether additional mitigation measures are needed; • Specific mechanisms to consider and implement additional mitigation measures; and • Specific thresholds that would trigger changes in management actions, monitoring or mitigation. We recommend that a detailed adaptive management plan for protecting Gunnison sage-grouse and its habitat be included in the Draft EIS. We additionally recommend that the BLM consider including precautionary management actions in the Preferred Alternative, and using adaptive management to relax conservation measures as Gunnison sage-grouse populations increase or achieve sustainability. Many land management practices and decisions could result in permanent impacts with few opportunities to reduce habitat fragmentation. For example, once a new road is constructed there would be permanent impacts to Gunnison sage-grouse habitat. For activities with more permanent impacts, it is not clear whether adaptive management would be successful in increasing the protection of Gunnison sage-grouse habitat once the land management practices and decisions have been made, which suggests that it would be better initially to err on the conservative side and provide for relaxation of requirements, as appropriate, through adaptive management.
021		000001	the revised RMPs must not unnecessarily restrict oil and natural gas development and other multiple uses on public lands that overlap GuSG habitat. Instead, the revised RMPs should strike a reasonable balance between sustained multiple use and sensible restrictions for the species that are supported by the best and most recent science and data.

Submission Number	Remarks	Comment Number	Comment
021		000002	Most importantly, BLM should defer to state and local GuSG efforts instead of one-size- fits-all federal approach in this planning effort. There are myriad efforts, plans, regulatory mechanisms, and other actions to conserve and protect GUSG and its habitat, which should drive BLM's management of the species instead of the top-down approach envisioned in BLM IM 2014-100.
		000003	We are seriously concerned about the restrictions in BLM IM 2014-100, particularly unjustifiable leasing closures and buffers around leks, and recommend that BLM refrain from including any of those instructions in any alternatives in the revised RMPs.
021		000008	In the RMP amendments, BLM must adequately consider the cumulative impact to the species and the combined habitat coverage of the significant efforts are already underway to conserve, protect, and recover the GUSG throughout its range.
021		000015	BLM must acknowledge and account for the numerous mitigation and protection measures undertaken by oil and natural gas operators to protect sage-grouse species. NEPA analysis at the project level is already a transparent and robust regulatory mechanism, commitments made under existing RMPs must be considered in this planning process.
021		000016	We strongly recommend that BLM acknowledge the myriad conservation plans and efforts focused on the GuSG and its habitat (see above). In its RMP amendments, we request that BLM ease operating restrictions on lands with ongoing conservation that are subject to existing or proposed conservation efforts areas, including lands enrolled under the GuSG CCAA, the recently completed Gunnison Basin CCA, or fee title ownership held by various land trust and ranchland conservation organizations with conservation measures applicable to GuSG. Since these areas are and will be protected via a number of conservation measures, BLM need not apply additional and potentially overly-restrictive operating standards.
021		000017	NEPA requires agencies to only consider "reasonable alternatives." BLM must avoid analyzing speculative, impractical, or uneconomic alternatives. given public lands must be managed for multiple uses, including oil and natural gas development, it would be contrary to existing statutes to analyze alternatives that prohibit or eliminate all oil and natural gas development within the area.
021		000023	Plan amendments should reflect site-specific circumstances to the greatest extent possible.
021		000024	We recommend that BLM field offices utilize Adaptive Management (AM) to adjust approaches for GuSG management based on new data acquired through monitoring the revised RMPs should allow the BLM to critically assess information about habitat on a local or regional basis when it considers GuSG stipulations on individual projects. Efforts of local working groups, including site- specific research, must be identified and incorporated into the planning process when applicable.

Submission Number	Remarks	Comment Number	Comment
021		000026	The application of conservation measures for GuSG should be limited to occupied areas. We disagree with the FWS' proposal to designate unoccupied areas as critical habitat and do not believe BLM should follow suit by applying conservation measures in areas that are not occupied by GuSG.
021		000028	We strongly caution BLM from including in its analysis citizen-based alternatives that prohibit or preclude oil and natural gas development and other multiple- use activities without providing explicit scientific support.
023		000002	Scope. The scope of this planning effort should be specific to conservation of GuSG on public lands administered and managed by BLM.
023		000004	Localized Conditions. Localized habitat conditions, the nature and existence of threats, and the status of conservation efforts may vary by populations across the range of the GuSG. This may warrant different measures and management responses. The BLM rangewide plan amendment process should recognize that measures may differ among the RMPs. We believe this planning process should honor the habitat objectives in the RCP as the rangewide standards for managing GuSG habitat, and that BLM management in the Gunnison Basin should continue to follow the direction and measures in the Gunnison Basin Candidate Conservation Agreement {CCA). This is consistent with the agency's guidance in its IM. There is no need for a fundamental change in BLM management in the Gunnison Basin of the GuSG with the Gunnison CCA. The EIS process will benefit from analyzing the positive results obtained in the Gunnison Basin.
023		000005	Existing Rights. The planning effort must recognize valid existing rights and entitlements.
023		000007	Focus on Occupied Habitat. BLM should focus on managing occupied habitat until a final decision has been made on unoccupied habitat. Unoccupied, proposed critical habitat has not been well vetted or finalized.
023		000010	APPLY ONLY NECESSARY TOOLS THAT HAVE DEMONSTRATED SUCCESS IN IMPROVING GUSG HABITAT AND POPULATION NUMBERS. We propose that for each proposed management action that the BLM utilize the following methodology for specific conservation actions: 1. Demonstrated need and/or threat to the species; 2. Demonstrated impact on need and/or threat; 3. Measurement, monitoring and assessment of the proposed conservation action.

Submission Number	Remarks	Comment Number	Comment
023		000011	ADOPT A MITIGATION HIERARCHY We ask that BLM utilize the following hierarchy for the protection of the species: 1. Avoidance: Avoidance of impacts in occupied habitats. 2. Minimization: Minimization when avoidance of impacts is not feasible. 3. On Site Mitigation: On-site rectifying of impacts (i.e. repairing, rehabilitating, or restoring the impact area) when avoidance or minimization of impacts is not possible. 4. Off Site Mitigation: Compensation of impacts by replacing or providing equivalent conditions off site. This is the last priority where avoidance, minimization or onsite mitigation is not possible. And, compensation of impacts should be required only in the instance of a "major federal action".
023		000012	BUILD ON EXISTING SUCCESSFUL INITIATIVES. Local, State, and Federal land management programs and regulations along with range-wide local efforts have collectively sustained and enhanced the health of the Gunnison Sage-grouse population. We acknowledge that there have been varying levels of success in different populations. We ask the BLM to recognize and evaluate the impact, value and adequacy of current GuSG conservation measures to protect the species including but not limited to the following: 1. RCP 2. Gunnison Basin Candidate Conservation Agreement (CCA) 3. Candidate Conservation Agreement with Assurances (CCCA) 4. Conservation Agreement by 11-counties, Two States 6. Local Government Land Use Regulations 7. Rangewide Non-regulatory local efforts (conservation easements, GuSG habitat projects, Gunnison Basin strategic committee and local work groups. We ask that BLM consider the above GuSG conservation measures both independently and cumulatively in the development of the EIS and in amending the Resource Management Plans.
024		000001	I care abut protecting the remaining Gunnison sage-grouse because it is a unique species found now only in southwestern Colorado and southeastern Utah. THE BLM public lands are critical to the sage-grouse conservation and recovery. BLM management plans musty balance resources use and extractions with species conservation, water shed protection and other public values on our public lands.
024		000002	I ask you, how will you incorporate new conservation measures for the Gunnison sage-grouse into existing resource management plans?
026		000002	I hope to have a working relationship with the BLM and look forward to the opportunities that will arise from this amendment process. We truly hope this effort is what is needed to keep the GUSG from being listed as an endangered species. My one concern is the completion date for this project July 2016, which is past the proposed November 2014 listing date set forth by the US Fish and Wildlife Service.

Submission Number	Remarks	Comment Number	Comment
030		000010	A key part of Adaptive Management is: * a robust, regular, and ongoing monitoring program that informs on-the-ground efforts and future plans, and * ƒ monitoring techniques, how lands will be prioritized for monitoring, and what percentage of managed areas will be monitored must be clearly described in the EIS * ƒ the will to make timely changes if what's being done isn't working. The EIS must describe what actions will be taken, in what time frame, and when monitoring identifies unsatisfactory conditions.
032		000005	BLM has a Multiple-Use Mandate We also remind BLM that neither the National Environmental Policy Act (NEPA) nor the ESA amends or alters the federal land management agencies' (LMA) statutory missions of multiple-use. Nor can an RMP impact valid existing rights. Among others, the planning process must not conflict with BLM's duties and authorities under the Federal Land Policy and Management Act of 1976 (FLPMA), the Mineral Leasing Act of 1920 nor the USFS duties and responsibilities under the National Forest Management Act (NFMA) and the Multiple-Use Sustained-Yield Act of 1960 .
032		000009	BLM Must Limit Management Objectives to Suitable Habitat USFWS has significantly overestimated the historic distribution of GuSG in its listing proposal. This exaggeration of historic distribution has resulted in a significant overstatement not only of habitat loss and fragmentation but also its associated impact. Upon review of the GUSG Conservation Assessment contained in the Rangewide Plan, of the 1.7 million acres proposed for critical habitat designation by the USFWS, 766, 462 acres are completely unsuitable habitat and are not occupied by the GUSG. The historic distribution portrayed in the listing proposal includes extensive landscapes that are decidedly non-habitat. Due to their unsatisfactory features, such as soils incompatible for sustaining sage-brush and the concentration of pinyon-juniper, it is highly unlikely these unsuitable areas will ever have any meaningful capacity to support GUSG populations. We strongly recommend that BLM limit its planning decisions to the suitable, occupied habitat documented in the Rangewide Plan because its identification is based upon 10 years of site-specific research and mapping efforts. It would be unjustified to arbitrarily expand protection zones to unsuitable or potential future habitat that may never be able to sustain a viable GUSG population.
033		000001	BLM should recognize the habitat objectives In the RangeWide Conservation Plan for purposes of BLM's range-wide management of GuSG habitat on public lands. Within the Gunnison Basin, BLM resource management should continue to follow the direction and measures in the Gunnison Basin Candidate Conservation Agreement We are unaware of a demonstrated need to change BLM's current management for GuSG in the Gunnison Basin.
033		000003	We support Gunnison County assuming a role as a Cooperating Agency in preparation of the EIS, and request that BLM work closely with the County and its constituents In this planning process.
033		000004	We hereby endorse the scoping comments submitted to BLM by the County Coalition.

Submission Number	Remarks	Comment Number	Comment
034		000001	After reviewing the information documents provided, HPD-TCP has concluded that the project will not have adverse affects to Navajo Traditional Cultural Properties. HPD-TCP on behalf of the Navajo Nation has no concerns at this time.
035		000002	Resource Management policy makers need to have clarity when thinking of impacting private land owners with their management plans.
037		000011	This planning effort should be explicit regarding how it will ensure that specified conservation measures are incorporated into ongoing planning efforts i.e. TRFO RMP & Moab MLP as described above. Resolution of pending protests on the Tres Rios RMP would also benefit this effort.
037		000019	Recommendations: BLM should comply with its guidance on regional mitigation to avoid, minimize and mitigate impacts to Gunnison sage-grouse and other resources through planning and management decisions. BLM's regional mitigation guidance, as well as the recent secretarial order, provides a framework for accomplishing these goals. Compensatory mitigation is an important tool, which should be used in accordance with the recommendations set out above.
037		000020	The BLM must provide a detailed plan and timeline for finalizing a monitoring framework and adaptive management plan (including setting out the actual specific management changes that may be needed). BLM should also incorporate cumulative impact analysis as part of any adaptive management program. BLM should ensure that the adaptive management plan incorporates commitments to "take immediate action to stop the continued deviation from conservation objectives" Additionally, BLM should provide details regarding the costs associated with any adaptive management plan, including those incurred by state agencies, in order to clearly outline what can and cannot be done given current funding climates and projections, and define their commitments accordingly. For all monitoring and adaptive management plans, the framework must be explicit, science- based, and implemented iteratively with triggers that result in management changes. Finally, BLM should consider establishing a working group that can coordinate regarding conducting and analyzing monitoring and determining needed actions.
039		000001	This particular plan is flawed for the beginning, in that the US Fish & Environmental Protection Service a "REGULATORY" agency is preparing for its decision in November of 2014. The BLM "Plan" is 2 years out.
039		000002	If the US Fish & Environmental Protection Service does list the Gunnison Sage Grouse, will the Conservation Measures the BLM is proposing be magnified to take even broader steps to keep the public from utilizing the "Public Lands" in an effort to provide for the survivability of the species???
039		000003	I hope that as soon as the BLM understands that the listing as an Endangered Species of the Gunnison Sage Grouse occurs or is more eminent, the agency will come back to the public it is working for and get additional input.

Submission Number	Remarks	Comment Number	Comment
041		000001	Delta County fully supports the multiple use mandate of the Bureau of Land Management (BLM) and would encourage the agency to not move towards a single resource oriented agency.
041		000002	The scope of the proposed EIS should be specific to the conservation of the Gunnison Sage-grouse (GUSG) on BLM administered lands.
041		000004	Delta County stresses the importance of concentrating limited time, dollars and resources on the occupied habitat and the EIS should focus on that. The unoccupied, proposed critical habitat has not been well vetted or finalized.
042		000003	Utilization percentages or stubble-height measurements, set forth in a formula and applicable west-wide throughout the GUSG, are not effective tools for adaptive management. Adequate residual plant cover must be determined by short-term and long-term monitoring, which includes accounting for various environmental conditions. See HR 042, pg. 3&4 "Residual, Cover, Usage" for examples. There are inherent disadvantages of inflexible, "one-size-fits-all" standards. An adaptive, case-by-case approach will ensure that efforts and resources expended in the name of GUSG conservation are well spent. Ecosystems vary; site potential, plant communities, environmental influences, precipitation patterns and plant production and vigor are highly variable and cannot be appropriately managed by single-source standards and guidelines. The regulations should give flexibility to land managers.
042		000004	Methodology of monitoring should be flexible enough to allow local input and modifications on the adaptability of the species. Monitoring should compel decision-making for adjustments in multiple-use activities only when adequate data justifies decisions.
044		000002	My greatest concern for this process is the essential conflict between the multiple-use mission of the BLM and the needs of the GUSG. When dealing with the needs and wishes of the various industries that lease BLM lands vs the needs of the GUSG, decisions favoring the grouse may be hard to make. Yet if they are not made, the GUSG is far more likely to become extinct. A species with decreasing population and only 5000 individuals remaining is unlikely to survive unless given such priority.
046		000002	Any plans you utilize should recognize adjoining private lands and not place regulations on those lands such as buffer zones.
046		000003	Consider the activities already existing on the multiple use public lands and try to keep that multiple use at its current level or even more uses allowed rather than restrictions that will not impact the grouse anyway.
046		000004	There should have to be a proof of valid reason and proof of real improvement to bird numbers of any management action and if it proves to not be working, then the management activity should be deleted from your plans. Do not continue to pile on more restrictions on top of more restrictions if they are not really changing the grouse numbers. Try something that will work for each different area. One plan does not fit all the lands.

Submission Number	Remarks	Comment Number	Comment
048		000017	Adaptive management should be used when identifying and implementing management recommendations and conservation/mitigation measures for power line impacts on GUSG. It is critical to better understand if raptor/corvid predation from power lines is a significant source of grouse mortality and how the presence of a power line affects GUSG use of various habitat types within proximity to the power line ROW. Mitigation in the form of funding research studies would be beneficial to both the agencies and industry in helping both groups understand the issues as well as identifying effective mitigation measures that could minimize potential effects. The BLM has acknowledged in public meetings that natural predation could be a significant factor in sage-grouse mortality, yet there is still no clear understanding of the extent of these impacts on overall sage-grouse populations. Additional research funds could be used to better understand natural mortality rates from both mammalian and avian predators and what other limiting factors in any given area are affecting the viability of a specific population.
048		000018	Tri-State would also encourage the BLM to partner with the local working groups and land trusts to identify habitat restoration projects that would be available to applicants working in GUSG habitat. This approach is currently under way for the lesser prairie-chicken across its range. Having potential mitigation options identified early on in the planning process will facilitate a more efficient NEPA process and would allow BLM biologists to prioritize what mitigation is available and would be the most beneficial for GUSG.
049		000004	The state recommends that for each proposed management action that the BLM utilize the following methodology for specific conservation actions: • Demonstrate the specific need and/or threat; • Demonstrated the impact of the proposed management action on the need and/or threat; • Measure, monitor, and assess.
049		000005	BLM should utilize the following hierarchy for the protection of the species: • Avoidance of impacts in critical habitats. • Minimization when avoidance of impacts is not possible. • On-site rectifying of impacts (i.e. repairing, rehabilitating, or restoring the impact area) when avoidance or minimization of impacts is not possible. • Compensation of impacts by replacing or providing equivalent conditions off site. This is the last priority where avoidance, minimization or onsite mitigation is not possible.

Submission Number	Remarks	Comment Number	Comment
049		000006	BLM should recognize the impact, value, and adequacy of current GuSG conservation measures to protect the species including but not limited to the following: • Resource Conservation Plan • Gunnison Basin Candidate Conservation Agreement • Candidate Conservation Agreement with Assurances (CCCA) • Conservation Agreement signed by 11-counties and two states • Local Government Land Use Regulations • Rangewide Non-regulatory local efforts (conservation easements, GuSG habitat projects, Gunnison Basin strategic committee and local work groups.
051		000001	the BLM should establish the following goals through this RMP amendment: • Comprehensively ameliorate the threats to each population of Gunnison sage-grouse on public lands. • Increase each of the seven Gunnison sage-grouse populations by conserving and restoring habitat on public lands. • Increase suitable habitat used by each of the seven individual Gunnison sage-grouse populations by conserving and restoring habitat on public lands. • Contribute to long-term increasing population trend for each of the remaining seven Gunnison sage-grouse populations. To achieve these goals, the RMP amendment should allow no direct or functional loss of occupied habitat for the six small populations outside of the Gunnison Basin. In the Gunnison Basin, the RMP amendment should allow no net direct or functional loss of occupied habitat. The RMP amendment should also provide for restoration and threat amelioration in unoccupied critical habitat across the species' range.
051		000008	In order to meet the requirement of analyzing an adequate range of alternatives under the National Environmental Policy Act, all of the alternatives (other than the 'no action' alternative) should include science-based conservation measures that address all of the primary threats to Gunnison sage-grouse. Each action alternative should designate some areas of Gunnison sage-grouse habitat for permanent protection as refugia where conservation of Gunnison sage-grouse is the highest priority. The plan should include multiple alternatives that provide more protection than recommended in the NTT report. All alternatives should include strong baseline protections for all occupied and critical habitat identified by FWS. These protections must be consistent with the most recent research on the impacts of various land uses and protective measures on Gunnison sage-grouse. All alternatives should address the concerns outlined by Colorado Parks and Wildlife and FWS comments on the preferred alternatives in previous draft and final RMPs. All alternatives must protect a sufficient amount of habitat to achieve the goal of increasing populations and current range of remaining Gunnison sage-grouse populations. All alternatives should ensure that conservation measures have a high certainty of implementation and success at conserving sage-grouse and their habitat.

Submission Number	Remarks	Comment Number	Comment
051		000009	The CCA includes some concepts that could be built upon to develop adequate conservation measures for Gunnison sage-grouse. In working to build upon the useful concepts in the CCA, it is important for BLM to: • Apply conservation measure to all projects (including all major development projects) • Recognize that more stringent conservation measures are needed in the small populations outside of the Gunnison Basin. • Comprehensively address threats to the species. • Address concerns raised in Rocky Mountain Wild's comments on the CCA, attached as Appendix 1.
053	Mentions Simms Mesa sub population	000003	The last management plan for the Colona District (1989) listed a priority for GUSG management in the Cerro-Simms Mesa habitat zone. However, I have not observed any implementation of BLM management efforts in the Simms Mesa area that would directly enhance or protect habitat for the GUSG. Consequently, given that GUSG may no longer be leking on Simms Mesa, that GUSG are proposed for listing on the Endangered Species List by FWS, and given that the BLM has apparently done little if anything to actively manage its Simms Mesa lands for the benefit of the GUSG since its 1989 RMP, it is critical and urgent that a specific management plan to improve habitat and limit grazing and human activity within Simms Mesa BLM lands during the reproductive cycle of GUSG be developed and implemented with fidelity .
055		000001	BLM is a signatory to the 2005 *Gunnison Sage-Grouse Range-wide Conservation Plan* (*GuSGRCP*). Threats identified in the 2005 plan remain today and should be addressed in the EIS.
055		000002	The BLM addresses oil and gas development issues for grouse with disparity to other BLM programs (like recreation). CPW recommends that the BLM consider expanding the application of oil and gas stipulations for grouse to address other BLM programs.
055		000011	CPW provided comments on the proposed San Juan/Tres Rios RMP revisions and the adequacy of proposed standards and guidelines in 2008 (Attachment 1), 2011 (Attachment 2), and 2013 (Attachment 3). In 2010, we also provided BLM's State Office (SO) with recommended standards for BLM's lease stipulations for GuSG and a variety of other species (Attachment 4). Consistent with these recommendations and much of the guidance provided in BLM Instructional Memorandum (IM) No. 2014-100, CPW encourages BLM to incorporate non-discretionary protective standards and conservation measures for GuSG when appropriate.
055		000013	we recommend that categorical exclusions (CXs) not be allowed to facilitate NEPA processes for projects proposed within the range of GuSG. Proposed projects should be evaluated on a case-by-case basis because of the significance of being located in GuSG habitat.
055		000017	CPW requests that BLM consider and analyze a wide range of cumulative impacts on GuSG, including impacts from projects that are in the planning or development phase...It is unclear how unanticipated future activities that may impact GuSG will be addressed in the EIS.

Submission Number	Remarks	Comment Number	Comment
055		000019	the cumulative impacts analysis should also consider threats/impacts from developments adjacent to BLM lands, e.g., residential subdivision development on private lands adjacent to occupied GuSG habitat on BLM land.
058		000001	Full transparency needs to be disclosed to the public and State governments, Tribal governments, and all County governments.
060		000001	I greatly appreciate that the BLM is basing its conservation plans on the science and information available about the current conditions under which the grouse is struggling. The goal should be to increase their numbers by protecting and enlarging their habitat.
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife.	000002	Address all land uses and related effects that impact sage-grouse and sagebrush steppe, including livestock grazing and invasive species, excessive noise and climate change factors that our often missing or discounted in management planning.
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife.	000004	Ensure consistent application of sage-grouse conservation measures across resource areas (BLM) and national forests and grasslands (USFS). Require that each tiered resource management and forest plan adopt the conservation measures prescribed in the EIS. Post all information related to the sage-grouse planning process on a website, including GIS data for priority and general sage-grouse habitat. Coordinate, cooperate, consult and collaborate with the public throughout the planning process (for example, work with commenters to properly interpret, format and analyze the Sage-Grouse Recovery Alternative in planning documents).
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife.	000010	The notice for the planning process indicates that planners may incorporate adaptive management strategies in management plans. The agencies must get this right by developing an adaptive management framework with science-driven triggers that indicate when management is not leading to desired outcomes. This will provide the accountability the public expects and the clarity that managers need to be successful. Adaptive management is not possible without adequate monitoring. Successful monitoring is objective-driven and keyed to appropriate indicators that provide the information needed for adaptive management.

Submission Number	Remarks	Comment Number	Comment
062		000001	Delta County firmly believes that there is not a need for a fundamental change in BLM management in the GUSG habitat within our county. Federal lands comprise 56% of the land in Delta County and our largest economic contributors depend on public land to conduct business. BLM is a multiple use agency and to change the focus of entire programs for one species is not an efficient use of resources and does not recognize the interconnectedness of public and private land. • BLM fully explore and acknowledge the significant amount of work, conservation, management changes and mitigation that has occurred at the local and state level. • Acknowledge the private land contribution of CCAA, CI, and easements and the value of these tools in managing the species • Allow for flexibility in management with emerging research • Address why the numbers were so high when stocking rate was much higher • Evaluate the current land uses and utilize mitigation instead of reduction or elimination for these uses • Evaluate the socioeconomic impact of the proposed management to ease use

Table 13 - Comments pertaining to Recreation and Travel Management

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000028	We are concerned that off-road vehicle use is a threat to the viability of Gunnison sage grouse populations, and that it should be carefully managed to prevent impacts to grouse populations. BLM should impose seasonal closures of these areas during the breeding and nesting season, and during winter for winter concentration areas. For proposed Critical Habitat, BLM should also close these areas through the early- and late-brood-rearing seasons. BLM must limit motorized vehicles to designated (not "existing") routes, identified through travel management planning across the Gunnison sage grouse range and marked on-the-ground.
001	Studies to be reviewed by BLM	000029	Mountain biking has the potential to be a significant source of disturbance to sage grouse, particularly when it occurs within 4 miles of leks during the breeding, nesting, and early brood- rearing seasons. The RMP should apply seasonal closures for mountain biking trails similar to those for roads.
001	Studies to be reviewed by BLM	000030	At minimum, all roads need to be sited at least 0.8 miles from lekking and nesting habitat, and main haul roads should be sited at least 2 miles away.
001	Studies to be reviewed by BLM	000031	BLM should minimize road densities to reduce habitat fragmentation and disturbance in occupied Gunnison sage grouse habitat, and should require road closures in seasonal habitats throughout their season of use by sage grouse.
002		000001	stop allowing gun wacko hunters to keep shooting sage grouse. issue an immediate ban on all hunting at any time in any location of this bird, which admittedly has a very low population.
008		000004	Plan to minimize driving for our drill pads, power lines and ranching,
013		000001	Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. The relative importance of recreation on a national basis is demonstrated by the Bureau of Economic Analysis statistics for spending on recreation. In 1979 the index for recreation spending was 32.537 (year 2000 = 100, http://www.bea.gov/national/nipaweb/TablePrint.asp?FirstYear=1979&LastYear=2004&Freq=Year&SelectedTable=33&ViewSeries=NO&Java=no&MaxValue=155.606&MaxChars=7&Request3Place=N&3Place=N&FromView=YES&Legal=Y&Land=). In 2004, the index was 113.695 for an increase of 349%. No other sector has increased this dramatically. Clearly, the public wants and needs adequate recreational opportunity and this should be the over-arching theme of this evaluation and decision.

Submission Number	Remarks	Comment Number	Comment
013		000002	Multiple uses of our public lands are marginalized every time a forest plan or resource management plan or travel management plan comes up for action. The motorized closure trend has created significant cumulative effects and has reached the point where it is causing severe public distress. Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be "no net loss" of motorized recreational opportunities with the Sage Grouse Plan.
013		000012	An adequate sense of magnitude must be employed within the analysis and decision-making. The evaluation and disclosure to the public must include the analysis and a comparison of the magnitude of OHV impacts to naturally occurring impacts for all resource areas used to assess impacts based on site-specific data. Lack of the comparison of impacts to naturally occurring levels combined with the lack of site- specific data could allow inaccurate statements and opinions due to the lack of an adequate sense of magnitude.
013		000013	The EIS must evaluate and acknowledge that close range viewing of sage grouse leks produces significantly more impacts on sage grouse than motorized recreation which is located some distance away. The EIS must include an accurate inventory of all viewing activity in order to reasonably assess this activity and its impact. Examples of the popularity and magnitude of the lek viewing activity include:
013		000014	If a motorized route is within a distance of a lek that might cause some disturbance, then a reasonable alternative that can be easily implemented is to relocate the motorized route as opposed to closing that route.
013		000015	According to available literature and studies there is little information related to the effects of motorized recreation on the Grouse. Based on current science it appears that motorized recreation in, any of its forms, does not have an significant impact on the Grouse.
013		000017	Regarding recreation, the plan amendments should direct local land managers to cooperate and coordinate with local governments and affected stakeholders to establish achievable goals for protection of the Grouse (lek /nest disturbance, wintering areas and sage habitat degradation) and to mitigate potential affects upon recreation through closure of existing, inventoried and managed routes.
013		000018	Any plan amendment should include adequate site-specific analysis on anticipated impacts of motorized and non-motorized recreational activities, which often have little to no impact on wildlife. The impacts of motorized and mountain bike routes that are primarily used for recreation should not be "lumped in" with highways and other high-speed access roads.
013		000020	Grouse leks are concise, well- established, historic areas that can last for decades. Add to this that leks are mostly in use for strutting/mating during crepuscular hours and that motorized recreation is generally NOT undertaken during those hours...the two can be successfully separated.

Submission Number	Remarks	Comment Number	Comment
013		000021	The analysis should include the fact that the BLM, Forest Service, state, county, local and tribal land management agencies are moving towards a "limited to designated route" paradigm. This process should prioritize areas where such planning has not yet occurred. We strongly believe that the goals, objectives and new paradigm can be met without severely limiting or restricting responsible, managed motorized recreation uses within the planning area.
013		000024	seasonal use and timing restrictions are problematic for public access to public lands. Doe the agencies anticipate creating special stipulations for OHV and public access?
013		000026	The timing restrictions and the buffer around leks are problematic. These time frames cover most of the recreation season and the distance is excessive.
013		000030	Listed below are some key concepts that should be considered as common sense prescriptions to protect the grouse in sensitive habitats. Ø Limit Use to Existing and/or Designated Roads and Trails. Ø Limit Competitive Motorcycle Races and other OHV Permitted Events Through Active Leks Between March 1 and May 15. Ø Adopt the SAEJ1287 Ø 96dBA Sound Law in Areas Designated as Critical Habitat. Ø Promote an Invasive Weed Species Related Prevention/Education Program. Most of the BLM managed lands in Colorado have already completed its travel management plan. I do not believe that a critical habitat designation is needed if federal agencies continue to designate roads and trails for motorized use. We believe the implementation of travel management, enactment of reasonable sound laws, and creation of an invasive weed species education program by both the Forest Service and BLM will insure we have a vibrant population of the grouse in Colorado.
018		000001	The AMA is concerned that incorporating broad conservation measures would needlessly limit off-highway-vehicle recreation. According to the U.S. Fish and Wildlife Service's June 26, 2013, Species Status Assessment, the effects of OHV use on sagebrush and sage-grouse have not been directly studied (Knick et al. 2011, p. 219)" (Species Status Assessment. 2013, p. 87). The assessment goes on to say, "there are very likely impacts caused by recreation but currently there are little quantifiable data available to assess the degree of this impact'•(Species Status Assessment, 2013, p. 88). we do not support limiting OHV recreation without just cause. As mentioned above, there is little scientific evidence that has directly and quantifiably linked OHV recreation to the species decline.

Submission Number	Remarks	Comment Number	Comment
019		000003	Prior to addressing the specific management standards for the management of the Gunnison Sage Grouse, ORBA believes that identifying the scope of issues that can be addressed in terms of species management with travel management of OHVs. The US Forest Service's Rocky Mountain Research Station has recently released extensive analysis of the effectiveness of travel management restrictions on addressing sensitive species related issues. These conclusions specifically found that travel management was not effective in addressing and the species related concerns were often beyond the scope of travel management to address. While the 2010 FWS listing decision specifically identifies fire suppression and oil and gas development as issues that are in need of regulatory improvements, the listing decision specifically identifies that recreational activities result in minimal impacts to sage grouse habitat. The Decision clearly states: "Although we anticipate use of pesticides, recreational activities, and fluctuating drought conditions to continue indefinitely, we did not find any evidence that these factors, either separately, or in combination are resulting in local or range-wide declines of greater sage-grouse."
019		000004	ORBA firmly believe that roads and trails can exist in partnership with wildlife and that often the threats to wildlife are unrelated to the existence of roads and trails in the habitat areas. ORBA believe that many of the species specific factors that are identified as heightened risk factors are the result of an overabundance of caution in dealing with these species, which ORBA understands. ORBA believes that directing limited resources toward the actual threats to the species is the only way to resolve these issues, and ongoing funding of the analysis of roads and trails, which is at most a secondary threat to species is not the best allocation of these limited resources.
019		000006	A Designated motorized route system is a significant benefit to the Sage Grouse. The listing decisions (2010 USFWS listing) clearly stated that adoption of a designated trail system for recreational purposes is of significant benefit to the sage grouse. Designated route system is highly relevant to the management of the Gunnison Sage Grouse as much of the BLM lands that are designated as possible habitat have moved away from large open riding areas to a completely designated route system, which would further reduce possible impacts to grouse habitat from recreational usage. As the USFWS has clearly stated recreational activity is a minimal threat, ORBA is concerned that any significant changes to recreational usage would create little benefit to the Sage Grouse populations and have little benefit in efforts to avoid listing of the Sage Grouse.
020		000006	Recreational use, including ORVs and mountain biking, in GUSG habitats can pose substantial threats to survival of the species, by destroying vegetation and nests, bringing in noxious weeds, and introducing noise and disturbance into the mating, nesting, brood-rearing and wintering areas. Establishment and enforcement of travel management plans and recreation provisions that are designed to protect GUSG habitat should be covered in the EIS.

Submission Number	Remarks	Comment Number	Comment
023		000014	RECREATION Recreation is critical to the local economy and needs to be managed to protect the GuSG. We again believe that the best way to protect the GuSG and manage recreational needs is through a coordinated and collaborative effort among private entities, local, state, and Federal agencies. Through a coordinated update of both the BLM Resource Management Plans and the GuSG Range-wide Conservation Plan we believe it will be possible to continue to enhance the populations of the GuSG and manage: a. Hiking and Biking Trail Usage b. Off road vehicles c. Equestrian use d. Hunting e. Fishing f. Special Events g. Other recreation oriented public land uses
028		000001	The United Four Wheel Drive Associations are an international organization of 4-wheel drive enthusiasts from all over the US, Australia, New Zealand, South Africa, and others. Access for motorized uses are vital to many local economies. We are very concerned with the impending impacts this issue may have on current and future Travel Management Plans.
028		000002	Very little data seems to be available stating vehicular and/or recreational use as being directly detrimental to the Gunnison Sage Grouse (grouse) habitat and we urge the agencies involved in this planning effort to require more in-depth studies be done *before* any trail closures be implemented. These studies would need to be done on an unbiased, best science basis to prove or disprove that recreational use of nearby roads and trails provide a serious impact to the habitat of the grouse. Grouse have existed with little or no known impacts from trail and road use. To close roads and trails before any actual knowledge of impacts is unwise and unnecessary. Any credible studies MUST be made available to the public to educate our membership as to how we may be able to make less impact on the Grouse.
028		000003	As for findings that road and trail use contribute detrimentally to the grouse, the UFWDA would support a "Designated Route" system *IF* it would allow access to the majority of the same area that current roads and trails do. Rerouting of current roads and trails away from critical areas would be acceptable IF and only IF the new routes can be constructed prior to closing the existing routes. In most of the critical areas, rerouting would be fairly easy as most sage areas are not that extreme as terrain. We trust that a "sustainable" alternate route would be constructed and "designated" as a motorized route within the NEPA and FLPMA guidelines.
029		000006	restrain motorized travel/recreation as much as possible.

Submission Number	Remarks	Comment Number	Comment
030	Mentions Sims Mesa Sub-population	000016	off-highway vehicle management should be managed in proposed, but currently unoccupied habitat as well as occupied habitat, e.g., Sims Mesa.
030		000017	minimize degradation of the resource.
031	Mentions Crawford Sub-population	000001	I would like to see more strict travel management, including enforcement, in the four mile area around leks. This should especially emphasize motorized travel, but could also include non-motorized in areas where lekking, nesting and brood rearing birds are being disturbed by shed antler hunters systematically combing the sagebrush in these areas. This definitely should be considered a ground disturbing activity. I believe that most of us with some familiarity with the Crawford population consider antler hunting and the possibility of development of the private Elk Ranch area the two most serious threats to this population.
041		000011	Recreation is a critical component of the Delta County economy and should not be sacrificed specifically for the GUSG.
047		000001	I see no harm in using the old roadways that afford us easier opportunities to engage with our environment and enjoy what mother nature has left us. Additionally, the grouse I have seen always move away from the roadways long before we ever get close to them…just as mother nature intended. Please accept and recognize my voice in keeping these areas open and accessible to ALL groups.
053	Mentions Sims Mesa Sub-population	000002	In addition, increased use of the area by motorcyclists and off-road vehicle owners, along with increased use of the mesa for target shooting, all during the GUSG breeding season, have further eroded the suitability of the Simms Mesa area for GUSG.
054	Note: Although directed at FWS literature, was included in BLM scoping comments so that "types of impacts" are explained in EIS	000001	Are primary concern lies within the US Fish and Wildlife report in which describes the preliminary threats to the Gunnison Sage-Grouse. Within those preliminary threats recreation is listed under "Other Threats" and is noted that recreation alone is not individually threatening to the Gunnison Sage-Grouse and does not cite specific effects recreation would have on the Gunnison Sage-Grouse as well as their habitat. We would request to understand the scientific assessment of these particular impacts in which recreation plays a role in adversely affecting the Gunnison Sage-Grouse and the landscape of their habitat.

Submission Number	Remarks	Comment Number	Comment
054		000002	the habitats it coincides with as some of the best mountain bicycling experiences within Colorado and Utah exist in these boundaries. Dispersed tourism is a concern among many of the locals as many rely on these high quality opportunities to bring visitors into their communities for continued viability.
054		000003	consider a recreation management plan that will mitigate any potential disturbance of the Gunnison Sage-Grouse or its habitat. Examples of such management can include time of day limitations to avoid lekking disruptions and comprehensive trails planning for routes to avoid fragmentation of the habitat. Trail construction techniques can be used as framework to entice and encourage trail users to conform to the desired conditions and avoid disturbing the Gunnison Sage-Grouse and their habitat.
055		000008	Recreation can destroy and degrade habitat displacing GuSG into suboptimal habitat. Development of recreational trails and roads alter habitat quality by reducing habitat patch size, making GuSG more susceptible to disturbance and predation. Additionally, trails and roads concentrate water during snowmelt or precipitation events altering the natural hydrology of the landscape. Concentration of water commonly causes increased erosion (i.e., head-cutting, incising) and lowering of the water table allowing noxious weeds and sagebrush to encroach wet meadows and mountain swale communities which are critical to brood-rearing and summer-fall habitat for GuSG. Restoration and protection of these limited seasonal habitats should be a priority.
056		000001	Gunnison Trails has worked hard to educate the trail using public about the importance of protecting the Gunnison Sage-grouse and the various life stages of this bird. Gunnison Trails also believes strongly in the Candidate Conservation Agreement (CCA) and we would like to see it remain as it is written because much effort, thought and science, from a multitude of agencies with species specialists and expertise, went into the creation of this document. The recreation community in the upper Gunnison Basin is highly cooperative, understanding and well educated about Gunnison Sage-grouse conservation at this time. The CCA, as written, allows for recreation activities to continue while still protecting Gunnison Sage-grouse and their habitat.

Table 14 - Comments pertaining to Social, Economic, and Environmental Justice

Submission Number	Remarks	Comment Number	Comment
003		000001	I do not support the curtailing of jobs for the sake of fish/birds/turtles etc--I love animals, however, I feel that people and jobs come first. I would request that you stand by your convictions and approve what is good for this country and consider that people and employment should have priority.
004		000002	Conservation and species protection should have higher priority over other "cash producing" land use and resource extraction interests.
007		000001	As the economic regional center for western Colorado and Eastern Utah, we are concerned about the potential negative socio-economic impacts some conservation measures the BLM may employee to manage Gunnison Sage-grouse habitat. Reasonable conservation measures must be employed that will have limited impacts on multiple uses of BLM lands and resources in the region that directly and indirectly impact the Mesa County economy, including energy development, tourism, recreation, grazing, etc. The EIS must include a detailed and thorough socio-economic impacts analysis of alternative conservation measures.
013		000029	The evaluation does not adequately consider that humans are part of the environment and the impact on the human environment of the proposed regulations and restrictions.
015		000006	FLPMA has stipulations regarding putting excessive regulations in regards to cost in its language. If the blm plans to require full plans of operation in regards to exploration activities, how does it plan to not be in conflict with FLPMA.
015		000017	How has the blm calculated the financial impact of these proposed regulations on private, county and state entities?
015		000018	What is the total dollar figure that the blm is using over the life of these new regulations? How much total economic impact will this have.
016		000004	The Economic Analysis methodology used in the FWS proposed listing was flawed because it incorporated a multiple baseline threshold set above a point that reflects the *world without the proposed regulation*. The FWS analysis methodology is "without meaning" as described by the Tenth Circuit Court of Appeals. The City staff urges that the economic analysis used for this BLM EIS not make the same assumptions that discount the true economic impacts - that is to say the economic impact must consider impacts related to all Occupied Habitat and Critical Habitat on federal lands affected by the final EIS decision, and the baseline conditions must reflect a single rational and objective threshold. Furthermore, it is urged that economic analyses address costs associated with regulatory permitting programs and elaborate upon the related economic impacts to several local employment sectors including, but not limited to, agriculture, construction, manufacturing, tourism, and recreation and local land conservation efforts.

Submission Number	Remarks	Comment Number	Comment
016		000005	If the E IS process incorporates an 1M PLAN (economic input-output model) analysis for grazing or other resource permitting active impacts, the stated Assumptions and Scope of the Economic Analysis can be significantly influenced by independent variables used. It is important to recognize that marginalizing the independent variables will cause a significant underestimation of the true direct and indirect economic market impacts. The Economic Analysis must not marginalize the impacts to small businesses and local government.
016		000006	City of Gunnison staff urges the Bureau of Land Management to include in all EIS Alternatives, not just programmatic federal lands factors associated with the protection of the species, but also the impacts that resource management decisions will have on the City services and operations, and the potential negative impacts on the employment sectors within Gunnison County.
021		000021	BLM must analyze the potential economic impacts that additional restrictions on oil and natural gas operations, and other uses of the public lands, such as grazing and recreation activities, will have upon local, regional, and national economics. An adequate socio- economic analysis will inform local stakeholders of the economic effects of additional restrictions for GuSG and is necessary for BLM to adequately assess which management strategy is the most viable. The oil and natural gas industry contributes significantly to local, state, and national economies, providing millions of dollars each year in royalties, bonuses, and severance taxes, besides other benefits of direct capital investment in local economies and high paying jobs. Accordingly, BLM needs to analyze the effect on the local, state and national governments from the loss revenue that will arise from the implementation of the new sage-grouse policies. The analysis should also include loss of jobs and the increase of unemployment compensation that may occur due to restrictions for GuSG.
023		000017	SOCIO ECONOMIC IMPACT CONSIDERATIONS. The BLM is requested to evaluate the socio-economic impact of its proposed management actions to the following areas: a. Recreation b. Mineral and Fossil Fuel Extraction c. Grazing d. Residential and private land development e. Impact to Agriculture and Water Management
025		000001	It seems as if common sense is thrown out the window when it comes to government descions. Private property owners are hurt financally and their freedoms are taken away. This also pertains to public lands and them being shut off from public use. Do not take away are private property rights or are public land access rights.
027		000001	I have concerns about the buffer zones around the nesting areas where no activity can be done in April and May, and I'm sure you understand that planting of crops is done during those months. I know you said that you were talking about public lands, and I want to stress that private land borders BLM land and disruption of farming activities would definitely effect the finances of farmers.

Submission Number	Remarks	Comment Number	Comment
030		000006	We suggest that the BLM look at: * impacts to local landowners, businesses, and county government. * the positive impacts of the alternatives to tourism, ecosystem services, etc.
032		000004	BLM needs to acknowledge that as a result of numerous conservation efforts, lek counts in the Gunnison Basin are not only stable; they are currently at historic highs. According to CPW, 79 percent of the occupied range within the Gunnison Basin is already adequately protected from threats through current federal wildlife management strategies, conservation easements, Candidate Conservation Agreement with Assurances (CCAA) certificates of inclusion, as well as county land use regulations. When planning for the GUSG, BLM needs to maintain an appropriate balance between the need for economic vitality throughout the region with the need to protect the species. This balance would allow the continuance of economic development of resources while affording reasonable, effective protection of the GUSG.
032		000011	A Comprehensive Economic Analysis is Necessary BLM is required under 43 CFR § 1610.4-4 (g) to analyze the level of dependence of local communities on resources from public lands during land use planning. The BLM Land Use Planning Handbook (H-1601-H) and Instruction Memorandum No. 2002-167 both address social and economic analysis for land use planning. Factors required to be analyzed include: demographic, economic, social and fiscal conditions and land use patterns. In addition, existing conditions and trends, as well as the impacts to conditions and trends associated with each alternative must be assessed along with the income and employment associated with all economic sectors, community infrastructure, state and local revenues and expenditures, and land use patterns. Additionally, NEPA requires analysis of socio-economic impacts in order to ensure that agency decisions do not result in a financial burden upon the communities which rely on public lands for their livelihoods and revenue. It is crucial for the GUSG economic impact analysis to recognize that economic benefits to local communities and the States of Colorado and Utah from oil and gas development will decrease proportionately due to the limitations imposed on future oil and gas development by BLM. In sum, BLM's analysis must address not only the tax revenue received state, city and county governments from oil and gas development within the planning area, but also other direct and indirect sources of revenue associated with multiple-use activities. Importantly, BLM must also address the possibility that proposed closures and/or severe restrictions on future exploration and development could significantly impact the socio-economic structure within these communities. We recommend that BLM include all sources of tax revenue in order to accurately disclose the impacts its management decisions will have on local government and communities within the planning area, particularly recognizing the beneficial economic relationship enjoyed by the oil and gas industry and local communities.
032		000014	A comprehensive socio-economic impact analysis is necessary that takes into account the needs of state and local communities as well as all sources of revenue generated from public lands

Submission Number	Remarks	Comment Number	Comment
036		000002	We also ask that BLM fully evaluate the socio-economic impacts of its proposed management actions on the economy of San Juan County including activities such as livestock grazing, mineral and fossil fuel extraction and renewable energy development.
041		000013	Finally, the BLM is requested to evaluate the socio-economic impact of its proposed management actions to the following areas: a. Recreation b. Coal c. Geothermal d. Minerals e. Timber f. Oil and Gas g. Energy Generation Facilities h. Livestock grazing L Residential and Private land development J. Impact to Agriculture and Water Management
046		000001	Please consider the economic impact your management plans will have on the communities of SE Utah and SW Colorado before you adopt a lot of management tactics to change a lot of lands to suitable that are currently only potentially suitable. Consider the cost to the agency in what those management plans might be and figure out whether this is a good option for your available funds.
048		000012	Another mitigation approach that has been suggested in various sage-grouse management guidance documents is undergrounding power lines to remove the risk of predation and reduce habitat fragmentation. Burying high voltage transmission lines poses a significant operational challenge for utilities and would significantly increase the cost of new projects, which is then passed on to our customers. Burying a high voltage transmission line, if feasible, can increase overall project cost anywhere from 6 to 10 times the comparable costs of an overhead line. Costs incurred by Tri-State and our members are passed directly along to the rate payers. Burying a transmission line in one part of our service territory could result in the inequitable sharing of costs for sage-grouse conservation for customers outside of the overall range for sage-grouse. For this reason, Tri-State has a Board Policy that states we will only consider burying transmission lines if the landowners and/or local jurisdictions agree to pay the difference in cost from overhead construction. . This is a substantial and significant cost difference that is passed along to the rate payer. For this reason it is imperative that mitigation for sensitive species is proven to be necessary and effective. Justifying this cost to people within the Gunnison Basin would be required and scientific evidence would need to prove that overhead lines are a significant limiting factor to GUSG survival in the planning area. As was previously discussed above, we have not found that any such research currently exists for either grouse species.

Submission Number	Remarks	Comment Number	Comment
048		000014	Another mitigation approach periodically requested of electrical utilities involves power line re-alignments to avoid occupied sage-grouse habitats. Re-locating an existing multi million dollar facility is cost-prohibitive and may or may not be a viable option for Tri-State and its members in some situations. Re-locating a transmission line can cost millions of dollars in permitting, engineering, and construction fees. In addition, new ROWs require new easements and may impact new and or additional private landowners.
048		000016	The economic analysis for the EIS should assess the potential impacts to utilities and their customers from both re-alignment of existing facilities and undergrounding of new or existing facilities. The approach to reroute a distribution or transmission line to avoid or reduce mileage in GUSG critical habitat would result in increased project costs that should be incorporated into the economic analysis.
049		000010	Recreation is critical to the local economy and needs to be managed to protect the GuSG.
049		000011	Resource development is vital to the economy of the region and can impact GuSG.
049		000013	The BLM is requested to evaluate the social and economic impact of its proposed management actions in the following areas: • Recreation • Mineral and Fossil Fuel Extraction • Grazing • Residential and private land development • Impact to Agriculture and Water Management
050		000002	The oil companies to ranching, are very important to this area and also consists of aspen and tember products (pine).
052		000001	the Dove Creek/Dolores County area was one of the most hard hit economic areas in the USA and that whatever rulings the Fishy Wildlife Bureau comes up with will be an additional economic burden.
054		000002	the habitats it coincides with as some of the best mountain bicycling experiences within Colorado and Utah exist in these boundaries. Dispersed tourism is a concern among many of the locals as many rely on these high quality opportunities to bring visitors into their communities for continued viability.

Table 15 - Comments pertaining to Special Management Areas

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000015	Manage the potential Critical Habitats as ACECs for vegetation composition and structure consistent with ecological site potential and within the reference state to achieve sage grouse seasonal habitat objectives.
001	Studies to be reviewed by BLM	000050	Lands with Wilderness Characteristics. This planning amendment addresses the protection of sage grouse habitats across southwest Colorado and eastern Utah, therefore directly affecting the naturalness and outstanding opportunities for primitive and unconfined recreation. It therefore requires consideration of an alternative that would protect wilderness characteristics pursuant to BLM Manual 6320.06. The designation of new Lands with Wilderness Characteristics ("LWCs") under BLM inventories in the planning area represents significant new information that must be addressed here. BLM must disclose the acreage and location of Lands with Wilderness Character that overlap with sage grouse occupied habitats, and any acreage or identity of LWCs and Priority or General Habitats should be disclosed in the Affected Environment section of the EIS. How many acres of LWCs overlap with potential Critical Habitat? How many of these acres would be protected by withdrawing Priority Habitats from oil and gas leasing and other surface-disturbing activities, and setting limits on industrial incursions on existing leases/claims under each alternative? The EIS must address lands not designated for protection of wilderness resources through the land-use planning process to date. The plan amendment should further designate all LWCs falling within sage grouse habitats to preserve their naturalness, solitude, and outstanding opportunities for primitive and unconfined types of recreation. Such protections would directly address threats that have been identified as threatening the persistence of sage grouse, such as infrastructure. This would confer addition protections on key sage grouse habitats, further buttressing the agency effort to apply adequate conservation measures for the bird.
020		000010	designation of some priority habitats as Areas of Critical Environmental Concern (ACECs) should be used to conserve GUSG habitat as well. Designation of large blocks of "core" habitat, in which no development would take place, should also receive consideration.
021		000025	We would likely oppose the designation of an ACEC or ACECs exclusively for GuSG and its habitat and urge BLM to reject nomination of areas for such designations. Due to existing operating restrictions and closures for GuSG and its habitat, designating an ACEC for these purposes is unnecessary and would unreasonably restrict responsible economic activities or could prevent entities from exercising their valid existing rights.

Submission Number	Remarks	Comment Number	Comment
037		000001	BLM must comply with current guidance requiring inventory and analysis of lands with wilderness characteristics. Manual 6320 requires BLM to consider lands with wilderness characteristics in land use planning, both in evaluating the impacts of management alternatives on lands with wilderness characteristics and in evaluating alternatives that would protect those values. Ongoing planning efforts should incorporate updated inventories of lands with wilderness characteristics (LWC), as directed by Instruction Memorandum 2011-154 and as defined by BLM Manual 6310. We expect that there is substantial acreage at issue. Deferring inventory and management decisions until proposed projects will not provide maximum benefits for wilderness characteristics or Gunnison sage-grouse. Further, the management adopted in this plan amendment could significantly impact natural areas including lands with wilderness characteristics.
037		000002	As the BLM looks to identify the highest priority habitats for increased protections for Gunnison sage-grouse, lands with wilderness characteristics should be prioritized where they overlap with Gunnison sage- grouse habitat as these are likely to be the highest quality and least disturbed habitats remaining.
037		000003	Although BLM seems to have analyzed how proposed conservation measures to protect greater sage-grouse may impact lands with wilderness characteristics, BLM should additionally consider whether and how protecting lands with wilderness characteristics would contribute to protecting and recovering sage-grouse.
037		000004	By identifying areas where Gunnison sage-grouse habitat overlaps with lands with wilderness characteristics and designating those areas for sage-grouse conservation, BLM can most effectively identify and protect a suite of values on our public lands. Prioritizing protection of areas with multiple values would be a smart approach to public land management that properly balances conservation with development.
037		000005	In most of the field offices affected by this EIS, full field inventories and public input on the proposed inventories has not yet occurred or is ongoing in these field offices, or determinations for management were made under previous guidance. Until full field inventories are completed under ongoing efforts and the public is given an opportunity to analyze and comment on these inventories, these inventories cannot be considered complete, and therefore BLM should adopt a broad approach to addressing lands with wilderness characteristics in this EIS.
037		000006	Where inventoried LWCs are not currently being managed as "natural areas," the value of these lands for Gunnison sage-grouse should still be evaluated.
037		000007	***Recommendations***: BLM should identify lands with overlapping conservation values for protective designation, including considering whether and how protecting lands with wilderness characteristics would contribute to protecting and recovering sage-grouse in the planning area, and incorporate an analysis of these benefits into developing and selecting a proposed plan. BLM should include all potential LWCs in its analysis and management decisions for this EIS, recognizing that LWC inventories are underway in a number of field offices, as well.

Submission Number	Remarks	Comment Number	Comment
037		000008	For the purposes of the Gunnison sage-grouse EIS, BLM should assume roadless lands adjacent to Wilderness Study Areas that overlap with mapped occupied Gunnison sage- grouse habitat in the Gunnison Basin and in potentially suitable habitat for the satellite populations likely provide important habitat resources for Gunnison sage-grouse and should analyze these potential LWCs for Gunnison sage-grouse conservation opportunities.
037		000009	For purposes of the Gunnison sage-grouse EIS, BLM should assume that all potential LWC units which overlap with mapped occupied Gunnison sage-grouse habitat in the Gunnison Basin and in potentially suitable habitat for the satellite populations and identify sage-grouse conservation opportunities on those lands. Alternatively, BLM could utilize the updated LWC inventory if BLM is able to publish its draft revised inventory for public review, accept public comments on the draft revised inventory, complete necessary field work and update the revised inventory in time to inform the Gunnison sage-grouse EIS.
037		000012	Specific management areas (areas where managing to conserve Gunnison sage-grouse habitat is the highest management priority) should be formally designated using a special designation. They can be designated as Areas of Critical Environmental Concern (ACEC), Special Interest Areas (SIA) or through use of an alternate type of designation that incorporates important management prescriptions. In either case, it is critical for specific management prescriptions that will be applied in the designated areas to be spelled out in the plan.
037		000013	All areas which meet the relevance and importance criteria "must be identified as potential ACECs and fully considered for designation and management in resource management planning." Gunnison sage-grouse habitat on federal land will meet this standard. However, even if these priority areas are not designated as ACECs or SIAs, BLM can identify them as other administrative designations, which will still provide for areas of more protective management. For example, the HiLine RMP in Montana incorporated 2 designation approaches that are used to protect sage-grouse and minimize habitat fragmentation: Grassland Bird/Greater Sage-Grouse Priority Areas, and Greater Sage-Grouse Protection Priority Areas[2] [2] See Draft HiLine RMP factsheet, available at http://www.blm.gov/pgdata/etc/medialib/blm/mt/field_offices/malta/rmp/draft_rmp.Par.77898.File.dat/HL%20Fact%20Sheet-Sage%20Grouse.pdf
049		000009	BLM should attend to the effects of wild horses and burros located in sage-grouse habitat. While livestock grazing is often singled out as the major threat to sage-grouse habitat, the EIS should report on wild horse and burros and contain plans for how to better manage these herds and their effect on habitat areas. The plans should focus on how to effectively manage the appropriate number of horses.

Submission Number	Remarks	Comment Number	Comment
051		000005	BLM should formally designate specific management areas where conservation of Gunnison sage-grouse habitat is the highest management priority. These areas should be designated as Areas of Critical Environmental Concern (ACEC), Special Interest Areas (SIA), or other administrative designation that applies management prescriptions that provide a very high level of protection for Gunnison sage-grouse. Regardless of the type of special designation used, it is critical for the amendment to detail specific management prescriptions to be applied in key habitat areas to conserve grouse.
051		000006	BLM's ACEC Manual (1613) provides additional detail on the criteria to be considered in ACEC designation, ...All Gunnison sage-grouse habitat on BLM lands, including both occupied habitat and critical habitat delineated by FWS meet the above criteria and should be considered for ACEC designation (or other special designation) in at least one alternative in the RMP amendment. We suggest that designation of all proposed critical habitat on public lands be considered in a conservation alternative. In addition, we nominate the following specific areas for consideration for ACEC or other special designation: • All habitat on BLM land currently occupied by populations of Gunnison sage-grouse outside of the Gunnison Basin, with a buffer around the occupied habitat that is large enough to ensure that activities authorized adjacent to the designated area will not result in functional loss or fragmentation of currently occupied habitat. • Priority habitat on BLM land in the Gunnison Basin. The Gunnison Basin Candidate Conservation Agreement (CCA) has identified priority habitat for Gunnison sage-grouse. At minimum, BLM should consider designation of the priority habitat identified in the CCA, with some improvements (See RMW comments on the Gunnison Basin CCA attached as Appendix 1). • Areas outside of priority habitat in the Gunnison Basin that have high potential for restoration and re-establishment of populations. • Any ACECs or special management areas in Gunnison sage-grouse habitat that have been included in current public or internal draft BLM RMPs (e.g., Tres Rios, Uncompahgre, etc.). We will provide additional information on areas that should be considered for ACEC designation prior to completion of the draft RMP amendment.
051		000007	The BLM should consider the following management prescriptions within the designated special management areas: • Fully protect priority habitat from large scale disturbances (e.g., transmission lines, oil and gas wells, graded roads, etc.) that will result in direct or functional loss of occupied habitat or will affect population grouse distribution and abundance at any level. • Implement measures to limit surface disturbance associated with valid existing rights below thresholds of tolerance for Gunnison sage-grouse, including: o Non-waivable no surface occupancy (this may be necessary to conserve the small satellite populations outside of the Gunnison Basin)

Submission Number	Remarks	Comment Number	Comment
			o A cap on cumulative surface disturbance of 1 percent. o No net increase in surface disturbance (building upon the approach in the Gunnison Basin CCA). • Exclusion of new rights-of-way. • Closure to cross country motorized use, with motorized and mechanized vehicles limited to designated routes; restriction on establishment of new routes (or no net increase in routes). • Restriction on motorized over-snow travel. • Seasonal timing limitations on travel on designated routes in sensitive areas (e.g., breeding and wintering habitats) during sensitive time periods. • Seasonal prohibitions on camping and non-motorized recreation in sensitive areas (e.g., breeding and wintering) during sensitive time periods. • Fully protect priority habitat from large scale disturbances (e.g., transmission lines, oil and gas wells, graded roads, etc.) that will result in direct or functional loss of occupied habitat or will affect population grouse distribution and abundance at any level. • Implement measures to limit surface disturbance associated with valid existing rights below thresholds of tolerance for Gunnison sage-grouse, including: o Non-waivable no surface occupancy (this may be necessary to conserve the small satellite populations outside of the Gunnison Basin) o A cap on cumulative surface disturbance of 1 percent. o No net increase in surface disturbance (building upon the approach in the Gunnison Basin CCA). • Exclusion of new rights-of-way. • Closure to cross country motorized use, with motorized and mechanized vehicles limited to designated routes; restriction on establishment of new routes (or no net increase in routes). • Restriction on motorized over-snow travel. • Seasonal timing limitations on travel on designated routes in sensitive areas (e.g., breeding and wintering habitats) during sensitive time periods. • Seasonal prohibitions on camping and non-motorized recreation in sensitive areas (e.g., breeding and wintering) during sensitive time periods.

Submission Number	Remarks	Comment Number	Comment
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife	000003	Establish a system of conservation areas, including areas of critical environmental concern (BLM), sagebrush conservation areas (USFS), research natural areas (BLM and USFS), national wildlife refuges (USFWS) and other specially designated areas to anchor restoration efforts by conserving the highest quality habitats. Prioritize conservation of areas of high biological value for sage-grouse and other sagebrush-dependent species. Designate sagebrush reserves that encompass centers of sage-grouse abundance which are large enough to achieve the goals of biological representation, and ecological redundancy and resiliency. Reserve areas should provide additional protections including mineral withdrawal, no new fluid mineral development, or surface disturbance. New rights of ways (ROWs) should be restricted, and the removal of infrastructure for oil and gas development and grazing will be prioritized.

Table 16 - Comments pertaining to Vegetation Management

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000021	Rest Following Fires and Treatments, and Grazing Adjustments During Drought are Necessary. It is critical that BLM rest from livestock grazing for several years all areas that have been subject to burns or vegetation treatments.
001	Studies to be reviewed by BLM	000025	The Conservation Objectives Team report (COT 2013: 44) recommended the following: "Avoid sagebrush removal or manipulation in sage grouse breeding or wintering habitats." Almost the entire sage grouse diet is made up of sagebrush, and this shrub also provides the key structural cover. Scientific studies relevant to impacts of vegetation treatments to sage grouse have found these to have negative impacts on sage grouse. But sagebrush does not re-sprout from remaining stumps/root masses following fire, and thus fire deprives sage grouse of both cover and forage over the long term, in addition to facilitating the spread of cheatgrass. In addition, new research (Rohde 2014) indicates that while native bunchgrasses can recover in the wake of ESR reclamation activities, sagebrush recovery is slow to absent.
001	Studies to be reviewed by BLM	000026	There is no scientific support for vegetation treatments as a means of improving grouse habitats, and to the contrary, numerous studies highlight negative impacts to sage grouse of this practice. The Conservation Objectives Team report (COT 2013: 44) recommended the following: "Avoid sagebrush removal or manipulation in sage grouse breeding or wintering habitats." Taking into account the negative effects of vegetation treatments on sage grouse nesting and lekking areas, and uncertainty in the overall extent of sage grouse nesting habitat surrounding lek sites, the BLM should prohibit vegetation treatments within 5 miles of sage grouse lek sites. BLM's own ecxperts recommended that federal agencies should prohibit vegetation treatments in Priority Habitats except where they are consistent with maintaining optimal sage grouse habitat (NTT 2011). The Preferred Alternative in the forthcoming EIS should reflect this recommendation.
001	Studies to be reviewed by BLM	000032	The role of fire in the sagebrush ecosystem, and how (or if) it drives the patch dynamics of the system, is poorly understood at present
014		000012	None of the forthcoming alternatives should allow the use of non-native seeds in restoration projects. It is not possible for these species to meet sage-grouse habitat objectives and every non-native species has the potential to become a future problem. A strict adherence to a native- and local genotype only restoration protocol should be common to all alternatives.
020		000007	Invasive species management, designed to support GUSG conservation, should be analyzed in the EIS.
020		000012	Use of prescribed fire, vegetation treatments, use of herbicides, and restoration of native vegetation should be covered as part of vegetation management regulation to benefit GUSG.

Submission Number	Remarks	Comment Number	Comment
029		000004	begin removal during non-breeding season of cheat grass, which degrades and destroys sagebrush in lek areas; and restore sagebrush where possible.
029		000005	designate new sagebrush reserves that link existing habitats to new areas to remedy fragmentation.
040		000001	In Montrose County, there has been major sagebrush fragmentation and every patch of sagebrush is important for the survival of the bird.
041		000008	There is a diverse set of conditions across the range of the GUSG and the flexibility to manage with the diversity needs to be clearly defined in the EIS. The soil conditions and moisture patterns limit environmental conditions and this must be detailed in the EIS so that one size fits all guidelines are not in the preferred alternative. The local conditions should determine the guidelines not the other way around. The EIS must have flexibility to provide for adaptive management and dealing with conditions as they arise.
055		000004	Wildfire and prescribed fire both have the potential to decrease the amount of sagebrush habitat available for GuSG in the near term. Prescribed fire as management tool may be appropriate in limited conditions; however, introduction and invasion of exotic weeds resulting from a burn is a major concern for GuSG. The long-lasting effects of fire on sagebrush regeneration and growth, and thus, impacts to sage-grouse nesting and winter habitats also need to be carefully considered prior to implementing prescribed fire in sagebrush systems.
055		000005	Cheat grass and piñon-juniper encroachment in the sagebrush biome reduces the value of the habitat to GuSG. The EIS should contain language that recognizes the value of proactive restoration projects and should prioritize projects that enhance or restore habitat.
061	References American Bird Conservancy, Wild Earth Guardians, Sierra Club, Defenders of Wildlife	000001	Restore and maintain sagebrush steppe habitat to its ecological potential across the historic range of sage-grouse.
063		000004	In SW CO Sage brush habitats still exist as they did many years ago, and are not being fragmented by development of subdivisions and commercial/industrial businesses as has occurred in the Gunnison area.

Table 17 - Comments pertaining to Water, Soil, and Riparian Areas

Submission Number	Remarks	Comment Number	Comment
001	Studies to be reviewed by BLM	000013	BLM should require the fencing off of natural springs with buck-and-pole fences (to reduce collision mortalities) and place livestock water sources outside the fences rather than at the spring itself. If past actions have dried up natural springs or wetlands to create stock tanks, then remedial action should be required return some water to ground for sage grouse and vegetation, in an area protected from livestock.
001	Studies to be reviewed by BLM	000015	We encourage BLM proposal to implement the following measures for grazing; these standards should be supplemented with measurable benchmarks to ensure strong rangeland health. Incorporate sage grouse habitat objectives and management considerations into all BLM grazing allotments immediately upon approval of the RMP amendment. Work cooperatively on integrated ranch planning so operations with deeded/State/BLM and/or USFS allotments can be planned as single units. Prioritize completion of land health assessments and processing grazing permits in potential Critical Habitat. Focus this process on allotments that have the best opportunities for conserving, enhancing, or restoring habitat for sage grouse. Utilize ESDs to conduct land health assessments to determine if standards of rangeland health are being met. Conduct land health assessments that include (at a minimum) indicators and measurements of structure/condition/composition of vegetation specific to achieving sage grouse habitat objectives. If local/state seasonal habitat objectives are not available, use sage grouse habitat recommendations from Connelly et al. (2000) and Hagen et al.(2007).Develop specific objectives to conserve, enhance, or restore potential Critical Habitats based on BLM ESDs and assessments (including within wetlands and riparian areas). If an effective grazing system that meets sage grouse habitat requirements is not already in place, analyze at least one alternative that conserves, restores, or enhances sage grouse habitat in the NEPA document prepared for the permit renewal. Manage the potential Critical Habitats as ACECs for vegetation composition and structure consistent with ecological site potential and within the reference state to achieve sage grouse seasonal habitat objectives. During drought periods, prioritize evaluating effects of the drought in greater sage grouse Core Habitat Areas relative to their needs for food and cover. Since there is a lag in vegetation recovery following drought, ensure that post-drought management allows for vegetation recovery that meets sage grouse needs. Manage wet meadows to maintain a component of perennial forbs with diverse species richness relative to site potential (e.g., 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

Submission Number	Remarks	Comment Number	Comment
			elevated mortality during the late brood rearing period. Where riparian areas and wet meadows meet proper functioning condition strive to attain reference state vegetation relative to the ecological site description. Reduce hot season grazing on riparian and meadow complexes to promote recovery or maintenance of appropriate vegetation and water quality. Use fencing/herding techniques or seasonal use or livestock distribution changes to reduce pressure on riparian or wet meadow vegetation used by sage grouse in the summer. Avoid grazing and trailing within lekking, nesting, brood-rearing, and winter habitats during periods of the year when these habitats are used by sage grouse. Analyze springs, seeps, and associated water pipelines to determine if modifications are necessary to maintain the continuity of the predevelopment riparian area. Make modifications where necessary, considering impacts to other water uses when such considerations are neutral or beneficial to sage grouse.
001	Studies to be reviewed by BLM	000022	Riparian areas are critical to maintaining sage grouse populations, and these areas are often heavily impacted by cattle. We are concerned that overgrazing by cattle in undeveloped riparian areas, and in proximity to range improvements such as fences and watering sites in and near springs and riparian areas are having significant negative impacts on sage grouse brood-rearing habitats. Water troughs and other range developments also have the potential to harbor *Culex tarsalis* mosquitoes, which carry West Nile virus; this is a potentially serious threat to sage grouse. The BLM's grazing policies and practices should discourage the concentration of cattle in the riparian zone to protect sage grouse brood-rearing habitats.
001	Studies to be reviewed by BLM	000023	Riparian areas should be the focus of monitoring efforts, as these areas can become ecologically impaired before upland habitats begin to show signs of damage. The federal agencies need properly functioning riparian areas to provide adequate brood-rearing habitat for sage grouse.
001	Studies to be reviewed by BLM	000024	the BLM should not rely on the placement of salt blocks as a means to draw livestock away from riparian habitats. The use of riders to herd cattle away from riparian zones has been shown to be an effective method to achieve the restoration of degraded riparian zones. A change in grazing regime may also lead to the restoration of Properly Functioning Condition in some cases. Rest from grazing can also result in the restoration of degraded riparian zones.

Submission Number	Remarks	Comment Number	Comment
014		000013	Riparian areas are critical habitat for sage-grouse brood-rearing. However, 'these are some of the most manipulated and degraded habitat types in Gunnison sage-grouse range. That and climate change will place sage-grouse brooding habitat in an even more precarious position. But the most impactful stressor is livestock... The forthcoming analyses must therefore provide high levels of protection for the riparian habitats on public lands and seek to allow no net loss of this ecotype.
014		000014	If riparian areas, particularly those in PPMAs, are not meeting reference conditions due to livestock, livestock should be immediately removed until conditions improve. This should be included in forthcoming analyses as common to every alternative.
042		000007	Developed water sources should be recognized for the benefit they provide to the greater sage-grouse ...Thus, maintenance of water developments should not be hindered by greater sage-grouse management activities.