

NWCOS--Comments on Alternatives, Goals and Objectives
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Draft
04/29/05

Vegetation/Habitat Management:

General Vegetation:

1. Add a goal and objectives to “Manage vegetation within the LSFO to reach and maintain desired plant communities.” These DPCs would be described within the RMP. Range across alternatives could vary by the intensiveness of management—vegetation rollover for the sake of vegetation structure, composition and arrangement variation across the landscape. This goal could serve as an overarching concept within which the varying vegetation goals for wildlife, livestock, etc could be arrayed.
2. Add specific goals for salt desert shrublands and mountain shrub communities to the list of vegetation types. Wording would follow Sagebrush Goals A and B. The wide diversity of forest/woodland types (i.e. aspen, pinyon-juniper, lodgepole pine, ponderosa pine, spruce-fir) in the LSFO may make it advisable to break these vegetation types out separately. Management practices and the proportion of habitats managed could reasonably be handled differently within the class between different alternatives.
3. Sagebrush Objectives A and B—I like the way they are written at present but could live with some alteration. I believe the concern raised about these at the last subcommittee meeting result from the same definitional issue we have struggled with in writing the sage grouse conservation plan. Everybody could live with the goal but struggled with the meaning of “large” and “sagebrush”, with particular concern that this objective is talking about mile after mile of closed canopy sagebrush stands. We are, or should be at least, talking about the sagebrush ecosystem at this level, not the sagebrush plant. I suggest, “Maintain large patches of high quality sagebrush habitats consistent with the range of natural variability for sagebrush communities in northwest Colorado” (Sagebrush Goal A Objectives 1), and “Reconnect large patches of sagebrush habitat consistent with the range of natural variability for sagebrush communities within northwest Colorado” (Sagebrush Goal B Objectives 1).

This range of natural variability idea has value in the other vegetation types as well (e.g. it is generally unnatural to have wide ranges of age classes within a lodgepole pine stand, which result from large, stand replacing disturbances. Age class variability in these communities should occur between stands, not within them.)

4. Sagebrush Goal B Objectives: add an additional objective to “Restore the quantity, species composition and species diversity of sagebrush understories.”

Fish and Wildlife Habitat:

1. Add a goal to “Manage habitat for a wide variety of wildlife species endemic to key vegetation types by maintaining adequate habitat quantity, quality and continuity.” (These key types would be those described in the general vegetation section, i.e. sagebrush shrublands, forests and woodlands, riparian and wetlands, salt desert shrublands, and mountain shrub communities.) Alternatives could vary by percentage/proportion of these areas managed for wildlife habitat. This goal does not imply replacement of other existing uses, but is an effort to raise the intentional level of management for these habitats while providing the other uses.
2. Goal A and B Objectives—adjust language to refer to range of natural variability as described in the vegetation section above. Add understory quality/quantity objective to Goal B as described above.
3. Alternatives should address a range of big game and other wildlife habitat enhancement treatments (acres or proportion over time).
4. Big game winter range: Severe winter range is stipulated in the current RMP for application of timing restrictions but few winters in the past 20 years have been “severe”. I suggest that the high protection alternative look at expanding the winter range timing stipulation to include “Winter Concentration Areas” in addition to Severe Winter Range. WCAs are mapped by CDOW and include areas where the density of wintering animals is at least 2X the levels in other areas.
5. Big game production/birthing areas: true that O&G activities are currently limited here, but recreation, timber harvest and other activities do occur in these areas. These areas are likely to be much more sensitive to disturbance in the LSFO than winter ranges, as usable winter range is quite plentiful.
6. Raptors: consider varying timing and distance stips by species of raptor to use the best available science.
7. Raptors: This may be one of the best places to apply A.M., by replacing stips with industry requirement to monitor nests and insure that they don’t abandon due to disturbance. This could provide better raptor nest occupancy data and information on the places, species, and conditions under which disturbance does or does not occur.
8. General for all species: describe and analyze whether adequate protection can be obtained by trading stipulations for on or off-site habitat development or enhancement (mitigation).
9. Sage grouse—consider greater sage-grouse ACEC or other habitat protection strategy to protect habitat supporting a minimal viable population of sage grouse in each population zone (described in more detail in the Special Designations section below).

Travel Management/Recreation:

1. Add goal to “manage motorized recreation to facilitate big game hunt quality and harvest success on BLM lands.”
2. Alternatives should evaluate the impacts of varying levels of motorized use on large and small, isolated parcels on wildlife habitat, hunting quality and success, and other environmental concerns.
3. Alternatives should also address impacts of varying levels and methods of antler harvest, variable effects of commercial outfitted hunting on hunt quality and success on large and small, isolated parcels, and the potential impacts of seasonal motor vehicle restrictions on big game hunt quality and success.

Special Designations:

1. Add a greater sage-grouse ACEC, or a series of them, to protect sufficient lek/breeding habitat to maintain a minimum viable sage grouse population in each of the population zones described in the Northwest Colorado Greater Sage-Grouse Conservation Plan to the “highest protection alternative”. The plan identifies 11 different zones within NW Colorado between the Utah state line and the Elk River Valley in Routt County. All or portions of 10 of them fall within the LSFO.

The current grouse ACEC proposal only impacts a single lek (maybe 3 if you include the satellites). While it is the largest currently active lek in NW Colorado at ~150 males, protection of this lek area alone will have limited impact on sage grouse conservation over the entire LSFO.