

Habitat Sector

Participants: Brad Petch, Ann Oliver, Geoff Blakeslee, Jane Yazzie, Rick Hammel, Josh Pollock, Wes McStay, Reed Morris and Luke Schafer

Introduction: The Wildlife/Habitat Sector believes that all three of our individual proposals are in one way or another related and complementary of one another. Therefore, we believe the best way to present these ideas is separately, but applied to one example that outlines how subsequent monitoring, criteria, and cumulative impacts analysis can result in better implementation of management decisions over the life of the RMP

In addition to the items presented in the last sector worksheet, this sector continues to discuss:

- Direct and indirect impacts to habitat (flora and fauna)
- Impacts to water quality
- Impacts to air quality
- Impacts and effectiveness of reclamation and other mitigation measures

Overall, this sector continues to focus on wildlife habitat with the desire to know for certain that existing wildlife and habitat resources will be here 20 years from now in the same or better condition. This sector advocates taking a cautious approach to managing these resources.

Proposal/Priority 1

We see few provisions if any in Alternative C that address, avoid, or minimize cumulative impact upon land health, habitat conditions, plant communities and wildlife populations over the landscape.

Cumulative impacts (CI) should be subject to continuous evaluation, and performed in consultation with other monitoring and environmental analysis/data sources such as Dinosaur Nat. Mon., TNC, CDOW, Colo. Natural Heritage Program and the Colorado Natural Areas program. Such CI analysis should be conducted every four (or five) years by BLM. The data for this analysis should come from monitoring protocols or exception/waiver criteria in Appendix X. The monitoring protocols must state, in detail, what the scientific measurement for the criteria will be and the goal to be measured against. The data must be capable of answering the questions implied by the exceptions and waiver criteria (or adaptive management criteria) for Appendix X and the criteria themselves must be broken down to answer specific questions about the resource to which they apply.

By performing periodic CI analysis, BLM will be able to provide greater long-term protection to wildlife habitat by 1) halting detrimental impacts on resources that may not otherwise be noticed through one-time, project specific analyses, 2) redirecting efforts to meet RMP goals that are not being met and 3) anticipate future habitat needs. This sector is looking at Land Health Standards as a vehicle for this continued CI analysis as a representative of systems-level analysis; however, we are uncertain as to their role in managing for oil and gas development and other non-forage based activities.

FOR EXAMPLE: At the last NWCOS meeting, Jeremy was illustrating how one would define a "HEALTHY HERD AND HABITAT" to identify measurable criteria for monitoring. Some ideas were thrown out that might be used for monitoring at this level, such as—population numbers and trend, body condition, adult and juvenile survival/recruitment, sex and age ratios, key habitat quantity, quality and trend, and shifts in animal behavior/range use. Of course, these would be different for mule deer, elk and pronghorn, sage grouse and other key species and/or habitat types. Additional criteria could be developed to measure the overall impact to the habitat as well (in terms of fragmentation and avoidance). This level of cumulative impacts analysis would occur at regular intervals throughout the life of the plan, especially for those resources that will be managed adaptively, if any.

Habitat Sector

Proposal/Priority 2

We are concerned about the lack of information and measurable decision points within Appendix X. In its current form, Appendix X could justify/facilitate almost any exception to the provisions of Alternative C

Appendix X is the most referenced piece of the current RMP and, in its current form, fails. Appendix X, or some variation of this idea, must present:

- 1) Defensible (and analyzable) waiver or exception criteria, OR
- 2) The basis for a scientifically-based AM protocol where appropriate, AND
- 3) Provide criteria that feed into the CI analysis.

To be used as either the criteria for waiver/modification/exception or an adaptive approach, Appendix X must address both large scale issues concerning wildlife population and habitat health (e.g. population size and trend, survival/recruitment, etc. as described in the example on page 1) and annual conditions such as winter severity, snow depth, temperature, etc. needed to make realistic and supportable assessments of current year conditions at the time of waiver or exception.

FOR EXAMPLE: The current RMP outlines some specific factors contributing to “MILD WINTER CONDITIONS” to be used when considering waiving, excepting, or modifying the big game winter habitat timing limitation. This list includes, snow depth, snow crusting, daily mean temperatures, and concentration of animals on winter range during winter months. Others could be added that would measure winter stress to the herd during early or late portions of the timing restriction. Detailed and regular monitoring of viability and trigger thresholds such as these can help feed into the regular CI (Priority/proposal 1) analysis and the regular CI analysis can feed into the exception/waiver criteria or adaptive approach.

In contrast, Appendix X only lists “weather severity” as an exception criterion. This generality is a step in the wrong direction if Appendix X is to be either a defensible basis for granting exceptions or the basis for adaptive management.

Proposal/Priority 3

The majority of stipulations in Alternative C only address impacts to vegetation, systems, and/or populations in the short-term. They do not address the long-term impacts of a given use or action.

Our concern is that timing limitations alone do not provide adequate year-round/long-term protections against habitat loss and fragmentation. The expansiveness of the current year-round proposal advanced by the oil and gas sector causes us even greater concern. The first proposal from a single company to allow year-round drilling on big game winter range has been expanded to include year-round drilling for all producers, for all habitat types, for existing and future leases. We continue to consider how our sector’s proposal to implement more long-term management protection (through, for example, stipulations for reduced surface disturbance or mandatory conditions of approval) could work with others’ concerns over timing limitations in areas that are allocated for more intensive development.

Others have proposed that “adaptive management first” and “allow year-round drilling” to be stated in the RMP. We propose that “mandatory conditions of development/approval” be added as well. We presume the year-round drilling proposal would cover existing and future leases. Adopting our proposed language would bring parity to the habitat resources and provide long term protections (reduced surface disturbance) within existing leases. For future leases, we would like to consider new stipulations that would manage surface disturbance. Management could be adaptive, where appropriate, and we continue to explore this issue.

FOR EXAMPLE: As in the examples of the “HEALTHY HERD AND HABITAT” and “MILD WINTER CONDITIONS” described above, monitoring would provide a basis for excepting/modifying or adaptively managing resources. Over the life of the plan, to be truly adaptive, management must be able to respond to varying conditions and new information and be able to both confine development to smaller areas and allow flexibility for timing, where appropriate and where monitoring determines such management is necessary. In the context of oil and gas development, we realize the ability to be truly adaptive is governed by the terms of the

Habitat Sector

lease (the stipulations) and the strength of the conditions of approval. This is why these stipulations and conditions of approval are the appropriate place for both specificity about protecting particular natural resources and flexibility that would allow BLM and lessees to meet these resource protection goals through adaptive management.

Habitat Sector

Addresses Concerns Raised By: Oil and Gas

Concern: RMP needs to be “more flexible” to allow year-round drilling

Our Proposal Is Refined:

Refined proposal:

This proposal would consider year round drilling in areas that are allocated to more intensive development while using additional management actions to reduce the overall surface disturbance (e.g. clustered wells, surface pad and/or road density, etc.) through conditions of approval or new lease stipulations. There needs to be certainty that controlled surface disturbance, in such a manner that protects the long term habitat needs of species, will be implemented.

This Solution Meets the Needs Raised By: Oil and Gas

Would be flexible to allow some year round drilling (areas or habitat types to be considered in future collaborations).

This Solution Meets the Needs of the Habitat Sector By:

Would receive commitments that long-term habitat protection measures will be a part of future development. This would be implemented under a framework of clearly defined outcomes, measurable management triggers, and monitoring fed into a broader cumulative impacts framework.

This Solution Also Meets The Needs of Other Sectors By:

Maybe wilderness and quiet recreation: That sector’s revised proposal stated that, with commitments for long-term habitat protections and reduced surface disturbance, they might consider some year-round drilling options (provided other areas, namely the citizens wilderness proposal areas are remain free from surface disturbance of oil and gas development).

Habitat Sector

Addresses Concerns Raised By: Moffat County

Concern: Adaptive Management First

Our Proposal Is Refined

Refined Proposal:

For some areas, this proposal would allow for adaptive management to happen first, provided that monitoring protocols are established, monitoring is funded, and management flexibility is retained in that development can be both constrained (application of stipulations, perhaps new stipulations on new leases) or relaxed (waiving or excepting stipulations based on a clearly defined criteria and monitoring of impacts).

Identifying habitat and systems monitoring protocols can be utilized for adaptive management of grazing and OHV. This is most difficult for oil and gas development because the spectrum of management options are essentially contained in the lease. Therefore, additional stipulations (certainly retention of the exiting stipulations in ALT C such as greater sage grouse and WTPD CSUs) are likely warranted as well as clearly described and required conditions of approval (such as the BMPs outlined for greater sage grouse—see last proposal).

This Solution Meets the Needs Raised By: Moffat County

They would like to see adaptive management

This Solution Meets the Needs of the Habitat Sector By:

Would receive commitments that long-term habitat protection measures will be a part of future development. This would be implemented under a framework of clearly defined outcomes, measurable management triggers, and monitoring fed into a broader cumulative impacts framework.

This Solution Also Meets The Needs of Other Sectors By:

Habitat Sector

Addresses Concerns Raised By: Wilderness and Quiet Recreation

Concern: that any adaptive approaches, especially flexibility in timing limitations, come with commitments for reduced surface disturbance.

Our Proposal Is Refined

Refined Proposal:

This Solution Meets the Needs Raised By:

This proposal looks to supplement the current timing limitations with additional long-term protections for habitat. For their proposal that considers adaptive management (including timing), this proposal also includes the potential for new stipulations for long-term habitat protections and mandatory conditions of approval.

This Solution Meets the Needs of the Habitat Sector By:

Would provide long-term protections for habitat.

This Solution Also Meets The Needs of Other Sectors By:

Moffat County: it could be applied adaptively.

Habitat Sector

Addresses Concerns Raised By: OHV

Concern: routes not be closed for no reason

Our Proposal Is Refined

Refined Proposal:

Through the ongoing cumulative impacts analysis and monitoring of resource trends through Appendix X or another adaptive approach, several of the adaptive criteria for OHV management (Appendix XX) will also be monitored.

This Solution Meets the Needs Raised By:

OHV—this approach, through continued resource monitoring and impact analysis, will feed into the adaptive criteria for OHV management.

This Solution Meets the Needs of the Habitat Sector By:

This Solution Also Meets The Needs of Other Sectors By:

Wilderness and Quiet recreation: provided that these areas where OHV is managed adaptively fall outside the citizens wilderness proposal lands, there would likely be no objection from this sector. The habitat sector realizes that this proposal really only talks about on the ground resources. Additional adaptive criteria in Appendix XX (such as user conflicts and use demand) would fall outside the scope and would still need to be monitored.