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**Western
Watersheds
Project**

Working to protect and restore Western Watersheds and Wildlife

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Dayle Funka
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Sent this date via the CARA comment page and via email to:

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RE: North Valley Allotments Project

Dear Ranger Funka,

The following comments are submitted on behalf of Western Watersheds Project and the Center for Biological Diversity with regard to the North Valley Allotments Project. Our organizations are keenly interested in the ecological health of the public lands in the Gunnison National Forest and have a long history of advocating for protection from livestock damage to these public lands. Western Watersheds Project is the nation's foremost non-profit conservation organization working to sustain and recover healthy public lands from the impacts of ecosystem-incompatible grazing. We seek to reduce the ecologically significant impacts of domestic cattle and sheep, and to ensure that federal agencies uphold the rule of law. The Center for Biological Diversity is dedicated to protecting and restoring imperiled species and natural ecosystems. The Center uses science, policy, and law to advocate for the conservation and recovery of species on the brink of extinction and the habitats they need to survive. The Center continues to actively advocate for increased protections for species and their habitats across Colorado.

As you know, I have worked on vegetation monitoring, noxious weeds treatments, or fencing projects in all of the listed allotments. I have also recreated extensively across the plan area. Some of the plan area is in good condition, but much of it is not. Particularly, riparian degradation and the widespread presence of invasive weeds indicate a need for management adjustment. We appreciate the Forest Service's consideration of a no-grazing alternative in compliance with NEPA requirements, and hope that managers take this alternative seriously for the benefit of the ecosystem.

We are concerned with the assessment of rangeland conditions based on selected “key areas.” Having been involved in the selection of key areas for vegetation assessment in the planning area, I am concerned about the reliability of these areas to reflect the real ecological impacts of grazing on the area. Monitoring is the cornerstone to any claim of ecologically responsible grazing, and if the monitoring regime is flawed it undermines the resultant management practices. The selection bias that is applied to avoid areas where there is heavy cattle use means that the impact of cattle on the landscape is not appropriately captured by the current monitoring. A science-based approach of randomly selected transects throughout pastures or assessment of both heavily- and lightly-impacted areas, rather than excluding areas of heavy impact, must be applied.

NEPA Concerns

Application of NEPA and Status of NEPA Regulations

As the Forest Service is likely aware, while this proposal post-dates the enactment of the Trump Administration NEPA regulations, those regulations have been challenged as illegal in no fewer than four pending lawsuits. *See, e.g., Env'tl. Justice Health Alliance v. CEQ*, Case 1:20-cv-06143 (S.D.N.Y. Aug. 6, 2020); *Wild Virginia v. CEQ*, Case 3:20-cv-00045-NKM (W.D. Va. July 29, 2020); *Alaska Community Action on Toxics v. CEQ*, Case 3:20-cv-05199-RS (N.D. Ca. July 29, 2020); *State of California v. Council on Environmental Quality*, Case No. 3:20-cv-06057 (N.D. Cal. Aug. 28, 2020). Soon after assuming office, President Biden issued Executive Order 13,990 directing federal agencies to review and address the promulgation of regulations and other actions taken under the Trump administration that conflict with the Nation’s environmental and public health values. The 2020 NEPA rule was specifically identified as subject to the review. The Council of Environmental Quality (“CEQ”) then took three actions: (1) extended the deadline by two years for federal agencies to develop or review proposed procedures for implementing the 2020 Rule; (2) a “Phase 1” rulemaking with narrow changes to the 2020 Rule; and (3) a “Phase 2” rulemaking proposing broader changes. 86 Fed. Reg. 55,757, 55,759 (Oct. 7, 2021).

CEQ has concluded its Phase 1 rulemaking, which fully restored analysis of direct, indirect, cumulative effects, 40 C.F.R. § 1508.1(g)(1)-(4), in addition to some other aspects of the 1978 Rule that the Trump regulations sought to obscure or otherwise remove. CEQ is currently undergoing its Phase 2 rulemaking and has an open comment period. The proposed rule would largely, if not fully, match and restore the pre-Trump 1978 regulations. 88 Fed. Reg. 49,924 (July 31, 2023). The 1978 regulations, as well as the proposed Phase II rewrite, explicitly require a consideration of effects regardless of what agency or individual undertakes the non-project related effects.

In short, while the regulatory language may arguably be in flux, the statutory directives, and four-plus decades of caselaw are not. The Biden administration’s direction to ensure agency NEPA analysis is not fundamentally or substantively altered to become anemic is quite clear. Accordingly, we implore the Forest Service to ensure its analysis is consistent with the letter and intents of NEPA and controlling caselaw.

Baseline data and information

The establishment of the baseline conditions of the affected environment is a fundamental requirement of the NEPA process, because an inadequate environmental baseline precludes an accurate assessment of project impacts. *Oregon Nat. Desert Ass’n v. Jewell*, 823 F.3d 1258 (9th Cir. 2016) (without accurate

baseline information the agency cannot accurately assess project impacts); *N. Plains Resource Council v. Surface Transp. Board*, 668 F.3d 1067 (9th Cir. 2011) (reversing decision due to inadequate baseline information). Agencies are not allowed to conduct post-NEPA analysis of baseline information as this impedes NEPA's goal of giving the public a role to play in the decisionmaking process. *Oregon Natural Desert Association v. Rose*, 921 F.3d 1185, 1192 (9th Cir. 2019). This information is required to be in the NEPA document, whether it be an EA or an EIS. Without baseline data, neither the public nor the agency can understand the effects of the proposed action or craft and analyze alternatives and mitigation measures to protect these values. As such, the Forest Service has a duty to identify the environmental baseline and affected environment, as well as the scope of impacts and where those impacts are most likely to be felt.

Here, the Forest Service needs to transparently discuss the baseline conditions in all the areas that would be affected by the proposed changes to grazing use. This requires discussing the site-specific conditions of all the allotments. The materials provided during this scoping period contain little, if any *current* baseline analysis of potentially affected water resources, conditions and trending conditions of Gunnison Sage Grouse and Rocky Mountain bighorn sheep habitat, and recreation use and its impacts within the analysis area. Without this necessary information, the decisionmaker and the public cannot make a reasoned decision about impacts much less the sufficiency of mitigation and the proposed adaptive management tool box tools that are being proposed.

Direct, indirect, and cumulative impacts

NEPA instructs that an agency is required to “take a ‘hard look’ at the impacts of a proposed action.” *Citizens' Committee to Save Our Canyons v. Krueger*, 513 F.3d 1169, 1179 (10th Cir. 2008) (quoting *Friends of the Bow v. Thompson*, 124 F.3d 1210, 1213 (10th Cir. 1997)). This hard look promotes NEPA's “sweeping commitment to ‘prevent or eliminate damage to the environment and biosphere’ by focusing Government and public attention on the environmental effects of proposed agency action.” *Marsh v. Or. Nat. Resources Council*, 490 U.S. 360, 371 (1989). NEPA achieves this focus through “action forcing procedures ... requir[ing] that agencies take a hard look at environmental consequences.” *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989) (citations omitted). These “environmental consequences” include direct, indirect, and cumulative impacts. 40 C.F.R. §§ 1508.1(g)(1)-(3); *Custer Co. Action Assn. v. Garvey*, 256 F.3d 1024, 1035 (10th Cir. 2001). NEPA's hard look should provide an analysis of impacts that is pragmatic and useful to the decisionmaker and the public. *Nat. Resources Def. Council v. Hodel*, 865 F.2d 288, 299 (D.C. Cir. 1988) (hard look premised on providing “analysis useful to a decisionmaker in deciding whether, or how, to alter [a project] to lessen cumulative environmental impacts”). While the undersigned urge the analysis for this proposal to be an EIS, as opposed to an EA, even with an EA, a full cumulative impact analysis is required. See *Te-Moak Tribe of Western Shoshone of Nev. v. United States DOI*, 608 F.3d 592, 603 (9th Cir. 2010) (rejecting EA for mineral exploration that had failed to include detailed analysis of impacts from nearby proposed mining operations).

A legally compliant impacts analysis stems from an adequate analysis and understanding of the baseline conditions for all the resources in the area and of the direct, indirect, and cumulative impacts analysis.

Adaptive Management

We appreciate the emphasis on managing grazing so that allotments meet satisfactory range conditions, contain functioning riparian and stream systems, and maintain healthy ecosystems. The flexible grazing management toolbox framework could be a valuable approach for improving grazing practices, but unless grazing authorizations and AMP's define thresholds for acceptable conditions and establish trigger points to change practices, these adaptive management strategies do not sufficiently address threats to ecological health. The flexible management toolbox framework leaves a great deal of latitude to local managers who are under pressure to balance many interests and are not always able to prioritize management for the best outcomes for the ecosystem. Relying on a flexible framework of "adaptive management" without the necessary accountability and metrics likely will not result in sufficient protections for the ecosystem and falls short of the analysis and transparency that NEPA requires. If the Forest Service is going to utilize an adaptive management approach, it must prescribe standards and trigger points based on measurable thresholds and indicators of impact.

Forest Service NEPA regulations, adopted in 2008, define adaptive management as "[a] system of management practices based on clearly identified intended outcomes and monitoring to determine if management actions are meeting those outcomes; and, if not, to facilitate management changes that will best ensure that those outcomes are met or re-evaluated. Adaptive management stems from the recognition that knowledge about natural resource systems is sometimes uncertain." 36 C.F.R. § 220.3.

These regulations further state that:

An adaptive management proposal or alternative must clearly identify the adjustment(s) that may be made when monitoring during project implementation indicates that the action is not having its intended effect, or is causing unintended and undesirable effects. The EIS must disclose not only the effect of the proposed action or alternative but also the effect of the adjustment. Such proposal or alternative must also describe the monitoring that would take place to inform the responsible official during implementation whether the action is having its intended effect. 36 C.F.R. § 220.5(e)(2).

The preamble to the Forest Service's regulation that adopted the adaptive management definition states that the agency must identify the proposed changes, and their impacts, in the NEPA document. "When proposing an action the responsible official may identify possible adjustments that may be appropriate during project implementation. Those possible adjustments must be described and their effects analyzed in the EIS." 73 Fed. Reg. 43,084, 43,090 (July 24, 2008).

The grazing management toolbox approach, proposed here, falls far short of these requirements. At a minimum, the Forest Service needs to revise the approach so it has a concrete and definitive set of actions, set definitive triggers for adjustments and what those adjustments would be, and analyze the impacts (direct, indirect, and cumulative) of the actions and adjustments. It is not sufficient for the Forest Service to loosely propose concepts that it may or may not deploy at its own whim, rather adaptive management must be rooted in concrete and definitive actions and plans. Monitoring results need to be publically available and should be posted on the agency's website for transparency of what monitoring

results are finding. When monitoring results indicate range health standards are not being met, this must trigger specific actions that remove stressors and until land health conditions improve to meet standards.

Allotment-Specific Concerns

Butte North

The proposed expansion of the earliest on and latest off dates within the Butte North Allotment is concerning. The allotment is north-facing and high elevation and has great variation in time of snow melt-off and therefore the season of green up and the ability for plants to establish and flower before grazing is a concern. In addition, the area is already highly impacted during the expansion time period by the Crested Butte Mountain Resort downhill bike park and overall high level of recreation at the resort. This not only poses a threat to the fragile subalpine and alpine ecosystem by adding pressure, but creates a possible public safety risk by adding cattle to an area with high-speed downhill mountain biking. Increased use of the area by cattle is likely to degrade the trails system and create an increased burden for the maintenance of trails and management of human travel.

Additionally, significant populations of yellow toadflax, canada thistle, bull thistle, and other noxious weeds exist on this allotment. The role of livestock in introducing and proliferating these weeds must be included in the assessment of livestock impacts.

Lost Canyon and Silver Springs

The Lost Canyon and Silver Springs Allotments contain some of the most significant degradation in the planning area, especially riparian and stream degradation, as described in the EA of at-risk stream reaches on Fisher Gulch and tributaries to Lost Creek (EA 14). The proposed increase of authorized cattle numbers to 200 cow-calf pairs from 169 pairs requires explanation. If rangeland and riparian conditions are degraded to a point that management procedures need to be overhauled, then why would the environmental stressor, cattle, be increased on the allotment?

As stated on page 9 of the EA, “There must also be sufficient monitoring data to support an AUM adjustment. If allowable use standards cannot be met and monitoring describes a downward trend in range health, then an AUM increase shall not be authorized, and an AUM decrease may be justified.” Despite the qualifications described in order for the proposed AUM increase to be authorized (EA 14), concerns with the quality of monitoring and the Forest Service’s limited capacity preclude the increase in authorized numbers. In this case it is more appropriate for the Forest service to decrease authorized AUM’s on the allotment through this permit renewal.

Additionally, significant populations of canada thistle and other noxious weeds exist on this allotment. The role of livestock in introducing and proliferating these weeds must be addressed in the assessment of livestock impacts.

Meridian

The Meridian Allotment area and the Washington Gulch drainage as a whole experience some of the greatest summer camping and recreation pressure on the forest. The Meridian lake area is experiencing a significant increase in visitation which poses significant challenges to avoid conflict between recreational

users and livestock. These impacts must be considered in a cumulative impacts assessment in order to assess how the burdens of recreational pressure and grazing pressure will be distributed on the ecosystem to avoid degradation. It is unclear how the proposed management actions will improve the at-risk stream reach on the tributary to Washington Gulch. More information is also needed to understand how the Meridian AUM's will be incorporated into the Slate Creek Allotment. If the 46 Meridian-permitted AUM's will be added on top of the current authorized AUM numbers within the Slate Creek allotment, how will this comply with the section 402 renewal process? Will it alter the grazing permit for the Slate Creek allotment?

Additionally, significant populations of bull thistle, canada thistle and other noxious weeds exist on this allotment. The role of livestock in introducing and proliferating these weeds must be addressed in the assessment of livestock impacts.

Spring Creek

The proposed expansion of the earliest and latest on/off dates within the Spring Creek Allotment is concerning. With a stream reach on Spring Creek already functioning at-risk, how does the Forest Service justify expanding the impact of livestock grazing on the allotment by increasing the potential time cattle will be on the landscape?

Almont Triangle

The Almont Triangle contains some of the highest-value winter range for elk and bighorn sheep in the area. The allotment experiences a high level of grazing pressure from native ungulates, and the extensive cheatgrass invasion on the allotment is evidence that native bunchgrasses and other native plant species are experiencing an unsustainably high level of grazing pressure. In order to protect the essential wildlife and plant resources of the area, livestock grazing pressure must be reduced.

The proposed expansion of the earliest on and latest off dates within the Almont Triangle Allotment is concerning. With the vegetative community on the allotment already showing a high degree of degradation, how does the Forest Service justify expanding the impact of livestock grazing on the allotment by increasing the potential time cattle will be on the landscape by almost two months?

Snodgrass

We oppose the provisions that allow the vacant Snodgrass allotment to be restocked or have a new permit issued, and propose permanent allotment closure for the Snodgrass allotment. The years of vacancy on the allotment and amount of work and impact needed to make the allotment ready to be grazed again make closing the allotment permanently a more appropriate and responsible action. Additionally, the area receives an incredibly high recreational burden from both campers and day users, and reintroducing cattle to the area would create substantial conflict.

Gunnison Sage Grouse

Scientific studies show that livestock grazing can have serious impacts on Gunnison Sage Grouse (GuSG), and that range condition has suffered on many allotments as a result of management under the present standards and guidelines. The renewed permits on the Lost Canyon/Silver Springs and Almont

Triangle allotments must include strengthened conservation measures to minimize the effects of permitted grazing activities on GuSG.

It is imperative that the Forest Service outline in-depth monitoring processes throughout the grazing season to inform their grazing management. This monitoring must include vegetation assessments in the riparian and wet meadow areas in addition to the upland transects currently used to assess range condition, as these areas are crucial for GuSG during the seasons that habitat is open for grazing (Davis et al. 2016, Crawford et al. 2004, Dinkins et al. 2014, Herman-Brunson et al. 2009, Kirol et al. 2012). To support the flexible grazing management toolbox framework, the Forest Service must establish robust monitoring programs and schedules and make the process for addressing monitoring findings and implementing changes transparent. In order to effectively utilize the prescribed utilization limits within GuSG habitat, monitoring must be done consistently, without selection bias, and made publicly available.

The forage utilization limits in the proposed action and alternatives are inadequate for Gunnison Sage Grouse protection. A forage utilization limit of 35% is the maximum allowable per best available scientific information (Boyd et al. 2014, Galt et al. 2000). The Forest Service should apply this 35% forage utilization standard as an absolute maximum across all GuSG habitats, not just to riparian areas if grazing is retained in GuSG habitats. Additionally, best available science establishes that at least 7 inches of residual stubble height needs to be provided in nesting and brood-rearing habitats throughout their season of use. According to Gregg et al. (1994: 165), “[I]and management practices that decrease tall grass and medium height shrub cover at potential nest sites may be detrimental to sage grouse populations because of increased nest predation... Grazing of tall grasses to <18 cm would decrease their value for nest concealment” (see also Connelly et al. 2000, Hagen et al. 2007, Herman-Brunson et al. 2009). For Gunnison sage grouse, Prather (2010) found that occupied habitats averaged more than 7 inches of grass stubble height in Utah, while unoccupied habitats averaged less than the 7-inch threshold. Foster et al. (2014) found that livestock grazing could be compatible with maintaining sage grouse populations, but notably stubble heights they observed averaged more than 18 cm during all three years of their study and averaged more than 10.2 inches in two of the three years of the study (see also Kaczor et al. 2011). This finding is consistent with the conclusion based on the science that maintaining at least 7 inches of residual stubble is necessary to maintain and recover GuSG populations. In Colorado sagebrush habitats, Manier and Hobbs (2007) found that excluding grazing resulted in threefold greater shrub cover and less bare ground, indicating that grazing influences visual detection of grouse beyond stubble height effects.

A growing body of evidence suggests that seasonal closures during GuSG lekking, nesting, and early brood-rearing may not be sufficient to protect populations. Davis et al. (2016) found that GuSG juvenile survival was lowest in the late brood-rearing stage during the late summer (June - October). During this period, sage-grouse are often found in meadows (Peterson 1970, Drut et al. 1994) and riparian areas (Crawford et al. 2004, Dinkins et al. 2014) adjacent to sagebrush (Peterson 1970), particularly in areas with good grass and forb cover (Herman-Brunson 2007, Kirol et al. 2012). Unfortunately, livestock also congregate and disproportionately impact these crucial riparian areas and meadows during this time period. Because current seasonal grazing restrictions only apply during the lekking, nesting, and early brood-rearing periods, they do not address this crucial period for juvenile survival. The grazing authorizations in the Almont Triangle and Lost Canyon/Silver Springs Allotments must assess the impact

of livestock grazing on late-brood rearing GuSG. The Forest Service must use this analysis to inform seasonal restrictions for grazing, and extend the utilization limits beyond July 16 to account for late-brood rearing impacts in the final authorizations.

One of the greatest threats to Gunnison Sage Grouse recovery is the proliferation of cheatgrass. As such, this permit renewal environmental assessment must adequately analyze the relationship between livestock grazing and cheatgrass spread. Not only are livestock known to spread cheatgrass seeds, but cattle hoof action can deteriorate biological soil crusts in sagebrush steppe ecosystems (Reisner et al. 2013, Root et al. 2020), which are highlighted in the DEIS (3.7-5) as an important cheatgrass invasion inhibitor (Condon et al. 2023, Chambers et al. 2016). The claim that livestock grazing can be used to inhibit or reverse cheatgrass infiltration is refuted by Williamson et al. 2020, stating, “grazing corresponds with increased cheatgrass occurrence and prevalence regardless of variation in climate, topography, or community composition, and [data and results] provide no support for the notion that contemporary grazing regimes or grazing in conjunction with fire can suppress cheatgrass.”

The North Valley permit renewal assessment must appropriately address the role that livestock play in the infiltration and proliferation of cheatgrass, and to apply best management practices to reduce livestock’s facilitation of the spread of invasive species in GuSG habitat. We strongly recommend the Forest Service eliminate livestock grazing wherever cheatgrass is found, not only within GuSG habitat. We also note that the Forest Service must consult pursuant to Section 7 of the Endangered Species Act with the U.S. Fish and Wildlife Service on this proposal and its effects on this imperiled endemic species.

Water Resources

Livestock grazing can have substantial impacts on the water, soil, and vegetative resources that are the basis for healthy functioning riparian areas and which contribute immensely to the health of the whole ecosystem. The impacts of livestock grazing on water resources through riparian species removal, soil compaction, increased erosion, reduced water quality, and stream warming must be considered in the EA.

One symptom that should be addressed is the destruction of beaver dams and beaver habitat over years of cattle grazing and associated activities. There is a growing amount of research that demonstrates the crucial role that beaver activity plays in the ecosystem by storing water on the landscape, slowing erosion and sediment runoff, cooling streams, and improving water quality (Fesenmyer et al. 2018, Thompson et al. 2021, Law et al. 2016, Jordan and Fairfax 2022). One notable benefit that has a burgeoning body of evidence to support it is that beaver ponds and their resultant wetlands create natural firebreaks that slow down fire progression and help contain wildfires (Fairfax and Whittle 2020, Fairfax et al. 2024). To address the wildfire crisis, a national priority for the Forest Service, requires using every tool at our disposal. Supporting beavers in their natural processes requires minimal investment and has the potential to provide high returns in ecosystem resilience. Unfortunately, cattle grazing has been shown to hamper beaver recovery and undermine this valuable resource (Small et al. 2016), and the costs of this ecosystem service loss should be considered in permit renewal environmental assessments.

The management action Livestock-5 (EA 20) has the potential to substantially benefit riparian areas, but only if specific requirements for permittee or rider actions are built into the management plan. Studies have shown that cows pushed out of riparian areas return to them within one day:

“Daily management of the herd was necessary to keep them from taking advantage of the absence of the herder. Once the herder missed a day of moving cattle, they quickly reverted back to their old ways of hanging on the creeks. This program did not employ a rider. It employed a full-time herder.” (Butler 2000, p. 23).

If it is impossible for the permittee to employ a full-time herder to keep cows from degrading riparian areas, then the Forest Service must consider if it is possible for grazing to be compatible with healthy riparian areas and if responsible management practices can be achieved in the current economic context.

The Forest Service often employs water catchments, diversions, or other developments to reduce livestock impacts on water resources, and we appreciate the effort to avoid riparian and spring degradation. These structural solutions, however, pose threats to water resources of their own, including lowered groundwater levels, decreased wetland expression, increased bacteria and pest species, and concentrated livestock impact. The EA needs stronger analysis of the impacts associated with livestock water developments.

For those riparian areas, stream channels, and springs that are negatively impacted by livestock grazing, the Forest Service should eliminate livestock grazing or at the very least require non-use until the areas have fully recovered.

Conclusion

Thank you for your full consideration of our comments and concerns. We look forward to reviewing future NEPA documents for this project. Please ensure that we are advised of the availability of any future NEPA documents in a timely manner and that WWP and the Center remain on the contact list/interested party list for this project.

Sincerely,

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