



**SAN JUAN COUNTY COMMISSION**

Jamie Harvey	Chairman
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January 16, 2024

BLM Southwest District Office  
ATTN: GUSG RMPA  
2465 S. Townsend Avenue  
Montrose, CO 81401

Re: Comments on Gunnison Sage-Grouse Draft RMP Amendment/EIS

Dear Planning Team:

As a Cooperating Agency in the development of the Gunnison Sage-grouse Resource Management Plan Amendment, San Juan County offers the following comments for improvement of the draft plan.

Areas of Critical Environmental Concern (ACECs) – San Juan County does not advocate for designation of any ACEC for Gunnison sage-grouse habitat in the County and concurs with the absence of such designation in Alternative D (Preferred Alternative). Special management prescriptions to protect and enhance Gunnison sage-grouse habitat in various sections of the Preferred Alternative are more than adequate to protect and enhance this habitat. Designation of an ACEC over these management prescriptions would be unnecessarily redundant.

Additionally, the scattered, isolated and small tract nature of BLM administered lands in Gunnison sage-grouse habitat does not fit the mold of a typical ACEC designation over a consolidated block of BLM administered lands. Designation of an ACEC over these isolated tracts would likely create challenges to efficient administration of these scattered segments.

Livestock Grazing – We are pleased to see that livestock grazing would continue to be authorized in Alternative D and that allotment specific adaptive management, rather than generic planning level prescriptions, would be used to maintain or achieve land health standards. We concur with the policy in Alternative D for instances of voluntary permit relinquishment, i.e. re-issuance of the permit or other options for continued livestock use are considered before consideration of closure to grazing. Livestock grazing is an important part of the economy, lifestyle and culture of the county as well as an important tool for maintaining or improving land health. County policy supports continued properly managed livestock grazing.

Travel Management – We concur with travel management prescriptions in Alternative D which limits BLM travel management planning to “BLM managed roads/trails”. In San Juan County habitat most if not all roads are County and State-claimed roads which are vital to the economy and lifestyle of the area. Since there are few if any “BLM managed roads/trails” in county habitat, we would not expect controversy in future travel management planning.

Fluid and Leasable Minerals – We are concerned that the leasing prescriptions proposed in Alternative D (NSO) for San Juan County habitat are overly restrictive so as to further discourage development in these medium to high potential mineral areas. We don’t see the need for more restrictive management especially with the lack or absence of grouse in designated occupied and unoccupied habitat areas. Controlled Surface Use and Timing Limitations would be more appropriate for these habitat areas.

Likewise, the prohibition of geophysical exploration in Occupied Habitat Management Areas (OHMA) in Alternative D is overly restrictive in light of the apparent no difference in presence of grouse in OHMA and Unoccupied Habitat Management Areas (UHMA) (few if any birds in either area). We suggest that geophysical exploration be allowed in both OHMA and UHMA with the conditions stated for UHMA exploration.

The mineral and energy sectors are important parts of the County’s economy and lifestyle historically having been major contributors to county taxation revenues, employment and community project funding generated by these industries. County policy supports the responsible exploration and development of mineral and energy resources. Special emphasis is placed on such mineral and energy development in the San Juan Energy Zone established by legislation (Utah House Bill 383, 2015, Utah Energy Zone Amendments). This energy zone includes all occupied and unoccupied designated Gunnison Sage-grouse habitat in the county as well as the entire decision area covered in this EIS.

Predation – We support the use of predator control as included in Alternative D. Predation is likely a factor contributing to the low population numbers in the Monticello habitat area, especially with the low number of grouse. Page 3.2-22 does not list predation as a threat to the Monticello population and should. Predation should at least be included in the list of threats of lesser magnitude.

#### Social and Economic Conditions

p. 3.16-10 and 3.16-11: Tables 3.15.5 and 3.16.6: It is not clear what land area these tables refer to. The narrative refers to Table 3.15.5 as “from all ownerships” and Table 3.16.6 as “within the decision and analysis areas”. Is the first table county-wide and the second decision area only? Clarification would lead to better understanding of these tables.

In these same tables it appears illogical that San Juan County drops from 45 (Table 3.16.5) to 7 (Table 3.16.6) in the Employment column while Dolores County increases from 4 to 152. Are these figures correct?

p. 3.16.17 Table 3.16.11: It is unclear why Visitor Days are the same for San Juan and Grand Counties but are different for each Colorado county. It would appear that each Utah county would also have different visitor day figures.

P. 3.16.22 Table 3.16.14: It is unclear why AUMs increase in Alternatives C and D from Alternative A in all counties. Agency staff have indicated it is because of the larger area for analysis in the action alternatives. It would appear that the analysis area should be the same for all alternatives to allow for an equitable comparison among alternatives. By showing an increase in AUMS in Alternatives C and D, this equates to a positive economic impact which is likely erroneous due to the differences in analysis area sizes in alternatives. In the Monticello population area, AUMs are not expected to increase due to management prescriptions in the action alternatives. It appears the analysis is faulty and should be corrected.

We appreciate this opportunity to comment and trust these comments will be given serious consideration.

Sincerely,

Jamie Harvey  
Chairman

cc: Jacob Palma, BLM Monticello Field Office