

July 16, 2006

Grasslands Revision Team
2840 Kachina Drive
Pueblo, CO 81008

Comments
Cimarron and Comanche National Grasslands
Land Management Plan
Proposed
Monitoring Questions and Performance Measures

Dear Grasslands Revision Team,

As the Cimarron and Comanche National Grasslands (C-CNG) non-NEPA comment period ended at end-of-business day July 14, 2006 while I was completing a national forest field survey, I trust you will accept these comments available to you upon your return to work on Monday morning, July 17, 2006. Lauren McCain of Forest Guardians left a message for me that you indicated as much last week, given that you were having a public meeting to inform people about the nature of this proposed monitoring as late as July 13, 2006 in Pueblo.

These brief comments follow and are cumulative with my more extensive comments of April 3, 2006 on the Draft Plan. As the CCNG is failing to analyze alternatives to the proposed plan (e.g., the Sustainable Use Conservation Alternative submitted by Forest Guardians), the CCNG is also failing to analyze alternative monitoring programs.

The following general comments are followed by some examples, which merely illustrate and do not encompass the extent of the problem:

1. **The proposed monitoring program fails to monitor causes of trends.** For instance:
 - a. Distribution and size classes of juniper stands on the mesa tops and foot slopes of canyons in relation to varying intensities of livestock grazing.
 - b. Vegetative conditions in the Shortgrass Prairie Ecosystem under conditions of intensive livestock grazing, wildlife grazing, and fire, as well as no livestock grazing or fire (see Part 2, Strategy, p. 16).
 - c. Whether grazing livestock in areas recently burned actually results in intended outcomes, i.e.,
 - i. providing high-quality nesting habitat for mountain plover (a species-of-concern); and
 - ii. increasing germination potential in areas near existing populations of Colorado Springs evening-primrose, Colorado fraseria, and Raven Ridge false goldenweed (Part 2, Strategy, p. 16)

Without monitoring trends in relation to causal factors such as varying intensities of livestock grazing, the C-CNG will have no ability to separate trends observed due to, e.g., global warming, fire, wildlife grazing, or livestock grazing. Trends mean nothing if the C-CNG does not provide for monitoring of variables that could jointly or separately account for the trends.

2. **The proposed monitoring program addresses only some Desired Conditions, and few if any Objectives.** For example:
- a. The results of varying control measures on highest priority invasive weed populations (Part 2, Strategy, p. 6)
 - b. Availability of nesting structures for ferruginous hawks (Part 2, Strategy, p. 7)
 - c. Functionality of gallinaceous guzzlers (Part 2, Strategy, p. 7)
 - d. Results of reseeding and replanting projects (Part 2, Strategy, p.8) , e.g., recruitment or failure of recruitment of young native shrubs into reproductive status in the presence and absence of elk foraging
 - e. Results in Canyonland ecosystem bottomlands of varying timing and intensity of livestock grazing, including presence or absence of winter grazing (Part 2, Strategy, p. 10).
 - f. Number of human-made fish passage barriers eliminated (or added) (Part 2, Strategy, p. 12)
 - g. Trends in restoration of natural channel geometry (Part 2, Strategy, p.12). The Strategy indicates the need to monitor changes in chemical, ecological, and physical parameters in stream segments, but no monitoring of physical or chemical parameters of stream segments is proposed.
Likewise, the Vision states that “Past watershed inventory efforts identified impairments on some Grasslands streams [including] bank damage, sediment, flow disruption, hydrologic modification, nutrient imbalances, and invasive plants” (Part 1, Vision, p. 11). The C-CNG does not propose to monitor any of these in the coming years.
 - h. Acres of less-than-desired scenic integrity moving toward (and away from) moderate or high scenic integrity (Pat 2, Strategy, p. 19)
3. **The proposed monitoring program fails to utilize either (1) reference areas (to compare with trends and conditions in areas impacted by livestock grazing, ORV use, oil and gas developments); or (2) baselines (by which to understand trends).**

In the absence of the use of reference areas or baselines, the C-CNG fails to employ basic scientific methodology and will remain ignorant of the consequences of oil and gas activities; livestock grazing; motorized recreation; and CCNG active management on the Grasslands. Likewise, the CCNG will be unable to separate consequences of activities from drought, global warming, or other regional or global trends.

4. **The proposed monitoring program fails to monitor sufficient parameters of even those elements being monitored.** For example
 - a. Measuring the “number of known sites” of specific plant species (see, e.g., Draft Monitoring plan, p. 7) or of animals (e.g., black-tailed prairie dog colonies, Draft Monitoring plan, p. 6)) will fail to detect losses in density or viability of such sites, and would even indicate an upward trend if one site were degraded into two smaller, fragmented sites.
 - b. Measuring the number of nesting birds on recently burned shortgrass prairie (Monitoring Plan draft, p. 11) is a meaningless activity absent same-season measurement of the number of nesting birds on comparable unburned shortgrass prairie.

5. **The proposed monitoring program fails to monitor numerous elements of high public interest,** e.g.,
 - a. The spread or decrease of specific invasive species, e.g., cheatgrass, and annual forbs.
 - b. Vandalism or degradation of heritage resources (i.e., not just number of sites monitored).
 - c. Grazing costs to the national public for the C-CNG grazing program (i.e., not just “grazing fees utilized by associations; Monitoring, p. 14))
 - d. Costs to the public of monitoring, enforcing, and mitigating motorized recreational use, and maintaining routes for motorized recreation on the C-CNG (i.e., not just “recreation fee retention”; Monitoring, p. 14)
 - e. Trends in water quantity of seeps and springs on the Grasslands. This is of particular importance to monitor so that oil and gas mining companies can be held accountable to loss of flow from seeps and springs.
 - f. Trends in water quality in relation to particular activities, e.g., riparian livestock grazing.
 - g. Proliferation of roads due to oil and gas extraction and ORV driving.
 - h. Presence of beaver for hydrological engineering, storage of water, extension of riparian wildlife habitat.
 - i. Impacts to migratory bird habitat.
 - j. Impacts other than vegetative composition in allotments with varying intensity and timing of grazing, including water pollution; soil compaction and water storage; bank trampling; water diversions; and population trends and diversity of amphibian, reptilian, and lepidopteran and other invertebrate native wildlife.

6. **The proposed monitoring program fails to provide the public with estimates of monitoring frequency, costs, or triggers for adaptations of management.**

The CCNG is essentially proposing nothing in this draft monitoring plan, because there is no candor regarding the expected Grasslands budget for monitoring, and no commitments as to expected frequency of monitoring. Furthermore, there appears to be no linkage between results of whatever monitoring is done and

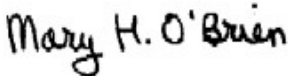
changes that the public can expect in management if conditions deteriorate, native species decline, or invasive species increase.

The track record is that in the absence of monitoring, potentially (and even obviously) degrading extractive and motorized recreational activities will continue unabated.

In summary, this proposed monitoring plan is inadequate; and scientifically and publicly unaccountable.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Mary H. O'Brien". The signature is written in a cursive, slightly slanted style.

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