

December 3, 2019

Ann Timberman, Supervisor
Colorado Ecological Services Field Office
U.S. Fish and Wildlife Service
445 West Gunnison Avenue, #240
Grand Junction, CO 81501-5711

Re: Draft Recovery Plan for Gunnison Sage-grouse

Dear Ms. Timberman:

We appreciate the work that the Service and collaborators have done in developing the Draft Recovery Plan for Gunnison Sage-grouse and of the outreach efforts the Service has made in our area. We recognize that this recovery plan is not a regulatory document but that it provides guidance for strategies and actions that would be conducive to recovery of viable Gunnison sage-grouse (GUSG) populations. We offer the following comments and observations on this plan.

General Comments

We have serious concerns whether the Monticello GUSG population can recover. In the past 23 years the population numbers have been low as indicated by the High Male Counts. Except for higher counts in 2000 and 2001 and in 2007 and 2008 the counts have been on a downward trend. This is especially evident in the past 11 years when the counts have dropped from 44 males in 2008 to 4 in 2019.

This decline has been during a time when habitat has been improving under Conservation Reserve Program (CRP) and Conservation Easements management. Undoubtedly weather conditions such as drought have been a factor in this decline. And, with a smaller and dwindling population, predation has likely been a more significant factor in this decline. It is likely that next spring's count will be even lower than the previous spring considering that this year's unusually dry summer and fall may have adversely affected the population.

Monticello habitat is significantly different than the other populations because it is 96% privately owned and is primarily agricultural land used for dryland farming and livestock grazing. Being privately owned, the uses made of these lands are solely the choice of the landowner unless tempered by regulation. Farming is generally not considered complimentary to sage-grouse as sagebrush has to be removed to prepare land for cultivation of crops. However, it should be noted that bird numbers were higher when crop production acreage was at its zenith as contrasted with the current situation where crop production acreage is at its lowest.

The creation of the CRP with initial enrollments in 1986 was an enticing alternative to many landowners who had been farming these lands primarily for wheat production.

Enrollment in the CRP allowed these lands to be removed from crop production and planted to long-term species that would improve soil, protect water quality and provide wildlife habitat. In the Monticello area, CRP lands were seeded with grass, forb and browse species and in some areas sagebrush seedlings were planted. In some areas the seed mix was designed to restore GUSG habitat. Some of these seeded and transplant areas have been somewhat successful in trending toward sage-grouse habitat. The majority of these lands are within designated critical GUSG habitat. But, even though these lands have been out of crop production for over 30 years, they are still classified as cropland and could go back into crop production when CRP contracts expire.

Specific Comments

II. Recovery Criteria

Delisting Criteria 1. We question whether the High Male Count target of 31 males for the Monticello population is realistic. As noted in our general comments, male counts have been steadily decreasing for the past 11 years. This has occurred during a time when conservation efforts have been in effect. One could conclude that regardless of the positive conservation efforts that have been implemented, the population has continued to decline. Achieving an average High Male Count of 31 when the male count for the past 4 years has been in progressively decreasing single digits doesn't appear reasonable.

A more appropriate target for the Monticello population may be in habitat rather than bird numbers. Monticello and Dove Creek habitats are fairly similar and since Dove Creek has a habitat target it may make sense to include Monticello in this habitat target category.

III. Prioritized Recovery Actions

Priority Action 1 calls for translocation of GUSG into the Monticello as well as other satellite populations. For the Monticello population this action includes the caveat that translocations not be done on a large scale until significant habitat improvements are completed so that habitat can support a viable population.

San Juan County does not support translocation even on a limited scale to prevent extirpation of the species in this area. We do not support translocation as we think Monticello habitat was marginal habitat and likely will be even more marginal due to changing environment (drought, climate change, predation). Translocation will likely only serve as a band aid and never result in restoration of a viable population.

Priority Action 4.a. calls for restoring and developing mesic and summer habitats. We question whether restoring mesic habitats is feasible since past weather patterns have led to drier conditions and loss of mesic habitats. Development of mesic habitats would be hindered by the scarcity of natural waters and limited potential to develop additional waters that would support mesic habitats. This action would likely have only limited application in the Monticello population and therefore not be very effective.

Priority Action 4.c. calls for increasing the acreage enrolled in CRP. This isn't feasible in the Monticello area because CRP enrollment is already at the maximum allowed by law. And, it is our understanding that most landowners not currently enrolled in the program have no interest in doing so even if additional opportunities were available. Other federal programs such as the NRCS' Sage Grouse Initiative and Environmental Quality Incentives Program (EQIP) may have very limited application for landowners interested in cost sharing in these programs. However, these programs are not available for landowners enrolled in CRP and most of these non-CRP landowners are engaged in crop production and are not interested in programs that may improve GUSG habitat.

Priority Action 6 calls for assessing the impacts of predation and then implementing predator management strategies. We think that predation is one of the significant factors in the decline of the Monticello population. Significant habitat improvements have been made over the past three decades but without a corresponding increase in the GUSG population. Policy and legislation such as the Migratory Bird Treaty Act may have worked against these habitat improvements by protecting species such as the common raven (a predator of GUSG nests) at the expense of GUSG. One report (J. R. Sauer et al. 2011) found that raven populations have increased 300% to 1500% in certain areas of the western United States in the past few decades. Local observers report many more ravens than were present in past years. Changes in existing law should be considered to allow more effective predator control or ravens. We recognize the challenges that a predator control program would entail but would support predator control efforts.

We appreciate this opportunity for comment and look forward to continued collaboration with your agency.

Sincerely,

Kenneth Maryboy
Commission Chairman