



Colorado Native Plant Society

April 6, 2018

Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO 81212

As Chair of the Conservation Committee of the Colorado Native Plant Society, I would like to thank you for the opportunity allowing organizations such as ours to comment during this 15-day period on the Environmental Assessment for the September 2018 Competitive Oil and Gas Lease Sale.

Below are our comments, suggestions and questions, in Section Order.

Section 3-1 - Introduction

Chapter 3 Introduction of the Environmental Assessment states that several resources and management issues were determined to not be present or not be significant, specifically including Special Status Plants and Lands with Wilderness Characteristics.

- Concerning Lands with Wilderness Characteristics, several parcels in Huerfano County, specifically 8086, 8088, 8089, and 8090 directly border the Sangre de Cristo Wilderness area. These coincidentally are the parcels closest to the Great Sand Dunes National Park. We are not sure how an arbitrary border would immediately end the wilderness characteristics of these parcels.
- There are two plant species designated by the BLM as sensitive which reasonably might occur on parcels up for lease sale. Neither species is mentioned anywhere in the report. This should have been addressed – please see page 2, Section 3.3.2.3 below for specific information.

Section 3.3.2

Within section 3.3.2. Biological Resources, there was no discussion at all of the effect on native plants, rare or common, although effect on invasive plants was discussed.

Section 3.3.2.1 - Invasive Plants

The Environmental Assessment provides incomplete information regarding the risks to native plant communities from the introduction of invasive species and noxious weeds as a result of oil and gas drilling. Soil disturbances as a result of drilling and associated activities, including the use of construction equipment and vehicles, which can introduce invasive species, will likely allow invasive species and noxious weeds to become established. This could irreparably harm both individual native plants and native plant communities.

On page 36, the Environmental Assessment asserts that *“leasing of the nominated parcels will not result in any disturbance, and; therefore, will not result in the introduction or spread of invasive species.”* It further asserts that *“[d]ue to practices such as interim and final reclamation, washing of equipment prior to mobilization, and regulations requiring effective weed suppression, if there are any cumulative impacts,*

they will be minor.” It is our opinion that insufficient information is provided in the Environmental Assessment to support the above statements.

What specific steps will the BLM take to reduce this risk? What specific requirements will the BLM impose on lessees to prevent the spread of invasive species and protect native plants?

Please provide support for the statement that cumulative impacts will be minor. While reclamation may return native plants to leased parcels, during the time that drilling is occurring on the property, how can BLM assert that there will not be any disturbances or that regulations will sufficiently protect native plant communities?

BLM must consider impacts while the parcel is being leased and may not simply consider the final composition of vegetation on the parcel once it has been subject to reclamation. Significance cannot be avoided by breaking an action down into component parts.

- Concerning the lease sales in Huerfano County, our concern would be the proximity of the Sangre de Cristo Wilderness area. Noxious weed species may be introduced by nearby activities and no subsequent weed management would be required since it would not be on BLM land and not subject to the APD. Part of this concern is roads being built that may open access to the Wilderness Area and increase recreational use that may carry introduced species from the construction sites into the Wilderness backcountry.
- Concerning reclamation of parcels in Baca, Kiowa, Lincoln, Weld, and Washington counties where it's reasonable to assume grazing may occur, the successful establishment of desirable species (taking into account landowner preferences) may include several non-native species. This might include the establishment of timothy grass or smooth brome after the disturbance of native rangeland species like blue grama or buffalo grass. So while the reclamation of the land would be according to policy, the outcome may permanently alter native plant communities.
- Do you have a reclamation/re-vegetation plan available for review - in particular related to soils/native plant revegetation?

Section 3.3.2.3 - Special Status Species

Failure to Consider Impacts to Imperiled Native Plant Species and Natural Communities - No special status plant species are mentioned or addressed in this section though it is reasonable to assume they may occur on the parcels being considered for lease sale

- *Asclepias unicaulis* ssp. *unicaulis*, a BLM-designated sensitive plant, has been recorded in Baca, Huerfano and Weld Counties which means its presence should be measured on 21 of the 28 parcels up for lease sale.
- *Aletes lithophilus*, another BLM-designated sensitive species, has been reported in Pinyon-Juniper woodland areas of Huerfano County which is exactly the land type of the 11 parcels up for lease sale.
- These are the only BLM designated sensitive species which obviously should have been addressed in this initial report but there are other rare and threatened species that should probably be taken into consideration and would need to be addressed specifically in any APD.

The Environmental Assessment contains a discussion of effects on invasive plants; however, it fails to include a discussion of the potential impacts to native plants, including the following native plant species and communities that may be impacted by the proposed leases. According to the Colorado Natural Heritage Program (“CNHP”), the following vascular plants and natural communities are located within the USGS 7.5 minute quadrangles subject to the proposed leases and are considered imperiled. CNHP

rankings are from 1-5 with 1 being the most imperiled and 5 being demonstrably secure. Species highlighted in red below are ranked 1 and considered critically imperiled.

<u>USGS Quadrangle</u>	<u>State Scientific Name</u>	<u>State Common Name</u>	<u>State Imperilment Rank</u>
<i>Creager Reservoir</i>	Astragalus brandegeei	Brandegee milkvetch	1/2
<i>Medano Ranch</i>	Carex lasiocarpa	Slender sedge	1
	Erigeron philadelphicus	Philadelphia fleabane	1
	Peritoma multicaulis	Slender spiderflower	2/3
	Rorippa coloradensis	Colorado watercress	H*
	Draba smithii	Smith whitlow-grass	2
	Gastrolychnis kingii	King's campion	1
	Oreocarya pustulosa	Catseye	1
	Phacelia denticulata	Rocky Mountain phacelia	U*
	Potentilla ambigens	Southern Rocky Mountain cinquefoil	2
<i>Mosca Pass</i>	Draba smithii	Smith whitlow-grass	2
	Gastrolychnis kingii	King's campion	1
	Woodsia neomexicana	New Mexico cliff fern	2
		Narrowleaf Cottonwood/Mixed Willows Montane Riparian Forest	2
<i>Red Wing</i>	Populus angustifolia / Salix (monticola, drummondiana, lucida) Riparian Woodland	Narrowleaf Cottonwood/Mixed Willows Montane Riparian Forest	2
	Carex simulata Fen	Wet Meadow	3
	Cercocarpus montanus / Muhlenbergia montana Shrubland	Mixed Mountain Shrublands	2
	Picea pungens / Alnus incana Riparian Woodland	Montane Riparian Forests	3
	Populus angustifolia / Salix (monticola, drummondiana, lucida) Riparian Woodland	Narrowleaf Cottonwood/Mixed Willows Montane Riparian Forest	2
	Salix exigua - Salix ligulifolia Wet Shrubland	Strapleaf Willow-Coyote Willow	2
	Liatis ligulistylis	Gay-feather	2
*H denotes a species that was historically known with hopes of rediscovery. U denotes unrankable; status cannot be determined at this time. Source: Colorado Natural Heritage Program			

Because this information is available only on the quadrangle level, we cannot comment with specificity at this time as to whether the above-listed species exist in the exact parcels proposed for leasing.

The Environmental Assessment is incomplete and must contain an evaluation of the impacts of the proposed leases on native plant species and communities.

What specific steps will the BLM take to reduce the risk of disturbance or impacts to the above-listed species as a result of the proposed lease sales?

4) Section 3.3.2.4- Upland Vegetation

Concerning the parcels in Baca, Kiowa, Lincoln and Washington counties where the land type is mainly considered uncultivated shortgrass prairie with interspersed drylands farming, our larger concern is the uncultivated prairie - the removal of shortgrass prairie climax species which are slow to impossible to re-establish regardless of interim or ongoing reclamation. The claim that long-term grazing may have altered the native vegetation has some merit if poor grazing regulations or over grazing has occurred, but there is the chance that healthy ecosystems exist within these parcels. Disturbing them would permanently alter the immediate ecosystem.

We look forward to the next opportunity to comment for this and future lease sales. Thank you for considering our comments, suggestions and questions.

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