



United States
Department of
Agriculture

Forest
Service

September 2008



Finding of No Significant Impact and Environmental Assessment

Cimarron and Comanche National Grasslands

Proposed Land Management Plan

**Pike and San Isabel National Forests
Cimarron and Comanche National Grasslands**

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FINDING OF NO SIGNIFICANT IMPACT

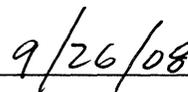
Purpose of the Finding of No Significant Impact

This finding of no significant impact (FONSI) and attached environmental assessment (EA) briefly present the reasons why the Proposed Land Management Plan for the Cimarron and Comanche National Grasslands (Proposed Grasslands Plan, or Plan) will not have a significant effect on the human environment and therefore an environmental impact statement (EIS) will not be prepared. The Proposed Grasslands Plan is categorically excluded from documentation in an EA or EIS. However, a FONSI and EA are being issued in this case, because a FONSI and EA were issued for public comment in 2005 (prior to there being a categorical exclusion for this type of action) and comments received assisted agency decisionmaking.¹

Finding

I have reviewed the EA for the Proposed Grasslands Plan and its alternatives. The EA documents that there is no cause-and-effect relationship between the future decision to adopt a plan which provides a strategic framework and guidance and any environmental effects. This relationship would exist only for a specific project or activity proposal. After considering the context of the Proposed Grasslands Plan and alternatives and factors related to the intensity of environmental impacts (40 CFR 1508.27), I have determined that the Proposed Grasslands Plan will not have a significant effect on the quality of the human environment. Thus, an EIS will not be prepared.





Responsible Official

Date

I base my finding on the following:

¹ Agencies may prepare an EA on any action at any time in order to assist agency planning and decisionmaking (40 CFR 1501.3(b)).

Context of the Plan

The context of the Proposed Grasslands Plan includes the geographic scope of the Plan, the nature of the Plan components, and the relationship of the Plan to actions which implement the Plan.

Geographic Scope: The Proposed Grasslands Plan applies to the Cimarron and Comanche National Grasslands.

Nature of Plan Components: The Proposed Grasslands Plan establishes a strategic framework to guide future management of the Grasslands and its resources. The Plan components are: desired conditions, objectives, guidelines, suitability of areas, and special areas.

Relationship of the Plan to Implementing Actions: The Proposed Grasslands Plan does not propose any specific action or make any commitment to undertake a specific action. The Plan does not approve any projects or activities, or command anyone to refrain from undertaking projects or activities. The Plan does not grant, withhold, or modify any contracts, permits, or other formal legal instruments. The Plan components themselves will not compel changes to the existing environment. Any commitments for actions will be made through projects and activities consistent with Plan components and applicable law. There will be no potential impact to the environment until a project or activity is implemented. At the time such projects and activities are proposed, additional environmental analysis and appropriate NEPA documentation will be completed.

Intensity

Intensity refers to the severity of impact. The following factors related to the intensity of environmental impacts (40 CFR 1508.27) were considered:

- 1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that, on balance, the effect will be beneficial.** Because the Proposed Grasslands Plan sets forth strategic guidance and information and does not propose any specific actions, the Plan itself will have no effects on the environment. Even the expected environmental conditions outlined in the EA (p.13–20) related to the strategic vision, ecological conditions, heritage, and paleontological resources do not have effects on the human environment.
- 2. The degree to which the proposed action affects public health or safety.** Because the Proposed Grasslands Plan sets forth strategic guidance and information and does not propose any specific actions, the Plan itself will not change the human environment and therefore will have no effects on public health or safety.
- 3. Unique characteristics of the geographic area, such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.** The geographic area covered by the Proposed Grasslands Plan includes areas with unique characteristics. The Plan sets forth desired conditions, objectives, and guidelines, and identifies special areas. Because the Plan sets forth strategic guidance and information and does not propose any specific actions affecting any of these special areas, the Plan itself will have no effect

on the unique characteristics of the Grasslands. Protection of riparian areas, wetlands, cultural and historic resources, and critical ecological areas will be influenced by the Plan's strategic direction as Plan components are aimed at protecting and enhancing unique ecological characteristics. The Plan makes no final decisions for actions. For example, while the Grasslands are identified as generally suitable for livestock grazing, the actual decisions about if, when, and where this activity will take place is addressed in range allotment plans and at the activity-level.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial. Because the Proposed Grasslands Plan sets forth strategic guidance and information and does not propose any specific actions, I find that the Plan has no effects on the quality of the human environment. Although comments received on the 2005 EA and FONSI indicate controversy about the content of the Plan, there is not a high degree of scientific controversy about the effects of the Plan on the quality of the human environment.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. Due to the context of the Proposed Grasslands Plan, I find there are no possible highly uncertain, unique, or unknown risks to the human environment from the Plan.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. The Proposed Grasslands Plan components provide environmental guidance and information for implementing actions. The Plan will guide specific actions when they are proposed, analyzed, and approved. Some specific actions may have significant effects (requiring an EIS for the proposal). The Plan itself does not require, compel, or establish a precedent for future actions, with or without significant effects, and does not represent a decision in principle about an implementing action.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts. Because the Proposed Grasslands Plan sets forth strategic guidance and information and does not propose any specific actions, the Plan itself will not have significant effects on the human environment. There cannot be cumulative significant effects of the Plan when the Plan itself does not have effects. Any direct, indirect, or cumulative effects on the environment may result from actions on the ground. When each specific project is proposed, its environmental effects, together with the effects of other past, present, and reasonably foreseeable on-the-ground actions, will be considered.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places (NRHP) or may cause loss or destruction of significant scientific, cultural, or historical resources. The Proposed Grasslands Plan itself does not adversely affect listed or eligible districts, sites, highways, structures, or objects. The Plan offers strategic vision and guidance for project and activity decisions. These

decisions will be based on appropriate NEPA analysis that will evaluate effects on these resources, as well as consultation with the Colorado and Kansas State Historic Preservation Offices (SHPOs). Plan guidance does not represent a decision that any activity would occur that might result in impacts to paleontological resources. It merely recommends mitigation that should be considered. Specific approaches to preventing or mitigating potential impacts from projects would be developed on a site-specific basis with appropriate consultation under the National Historic Preservation Act. In May 2008, both the Colorado and Kansas offices of the SHPO submitted their concurrences that implementation of the Grasslands Plan will not result in adverse impacts to cultural resources (Contiguglia 2008, Zollner 2008).

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973 (ESA). The Proposed Grasslands Plan itself does not adversely affect an endangered or threatened species or any designated critical habitat. The Plan offers strategic vision and guidance for project and activity decisions. These future project and activity decisions will follow appropriate NEPA analysis to evaluate effects on these species and will comply with the Endangered Species Act. In May 2008, the U.S. Fish and Wildlife Service (USFWS) agreed that because of the strategic and aspirational nature of the Grasslands Plan, section 7 consultation under ESA is appropriate during project-level planning (USFWS 2008).

10. Whether the action threatens to violate federal, state, or local law or requirements imposed for the protection of the environment. The Proposed Grasslands Plan meets the requirements of the National Forest Management Act of 1976 (NFMA) (16 U.S.C. 1600 *et seq.*) and the 2008 National Forest System Land Management Planning Rule (2008 Planning Rule) at 36 CFR 219 (73 FR 21505, April 21, 2008) (USDA FS 2008a). The Plan meets the requirements of the NEPA (42 U.S.C. 4321-4346) through the Agency's preparation of an EA and this FONSI. The Plan sets a framework for future management decisions. The Plan itself makes no decisions that could potentially violate any federal, state, or local law or requirement imposed for the protection of the environment.

ENVIRONMENTAL ASSESSMENT

Why This Environmental Assessment Was Prepared

This environmental assessment (EA) documents the analysis of pertinent foreseeable environmental effects for consideration in determining whether to prepare an environmental impact statement (EIS). Cited documents and other information related to the Cimarron and Comanche National Grasslands Land Management Plan (the Proposed Grasslands Plan, or the Plan) can be found at:

http://www.fs.fed.us/r2/psicc/projects/forest_revision/gr_rev.shtml.

The proposal—the Proposed Grasslands Plan—is a revision of the parts of the 1984 Pike and San Isabel National Forests and Comanche and Cimarron National Grasslands (PSICC) Land and Resource Management Plan (1984 Plan)² that pertain to the Grasslands. The Proposed Grasslands Plan provides broad guidance and information for project and activity decisionmaking. The Plan does not include any actions that approve projects and activities, or that command anyone to refrain from undertaking projects and activities, or that grant, withhold, or modify contracts, permits, or other formal legal instruments. Because of the strategic nature of the Plan, there is no cause-effect relationship between the Plan and environmental effects.

The required content of an EA is described in section 1508.9(b) of the Council on Environmental Quality (CEQ) regulations. An EA shall include brief discussions of the need for the proposal, of alternatives as required by section 102(2)(E) of NEPA, of environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.

Need for the Proposal

A revision of the 1984 Plan is needed because the National Forest Management Act of 1976 (NFMA) requires that plans be revised at least every 15 years. Land management plans provide broad guidance and information for project and activity decisionmaking. The planning area for the Proposed Grasslands Plan is the National Forest System (NFS) lands of the Cimarron and Comanche National Grasslands (see Map 1). The Proposed Grasslands Plan will provide a strategic framework to guide project and activity design and decisions, and budget development.³

The Proposed Grasslands Plan does not propose specific actions or make any commitments to implement specific actions, such as projects, activities, products, or services. Any actions to implement the Proposed Grasslands Plan will be subject to appropriate NEPA analysis and documentation and other statutory requirements at the time they are proposed.

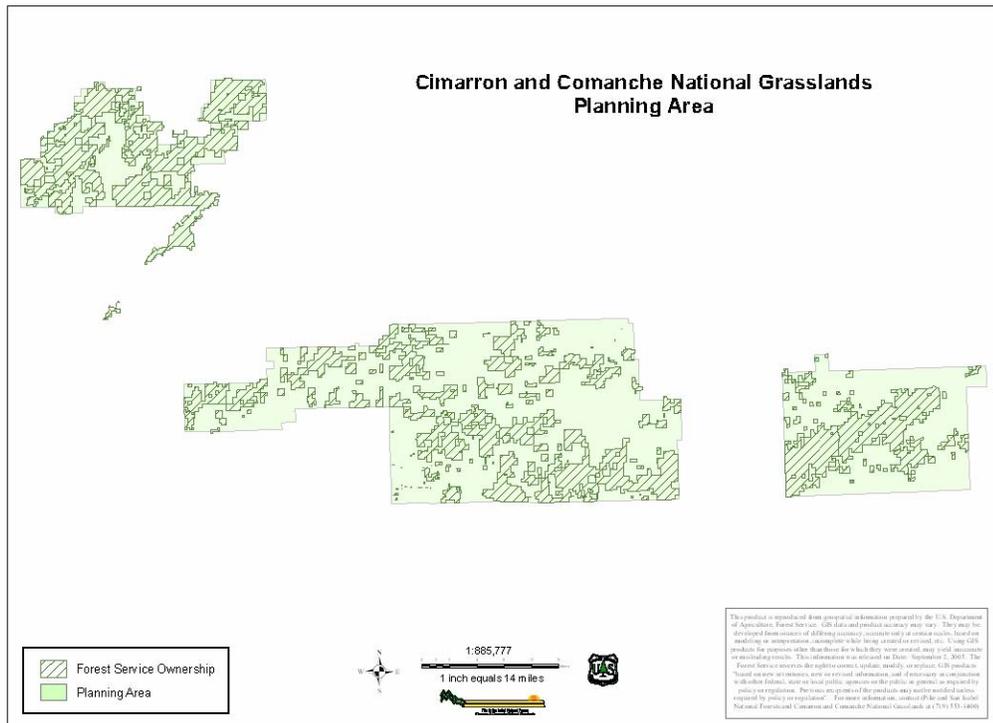
² The complete revision of the 1984 Plan will result in two separate land management plans for the PSICC; the Grasslands Plan, and the Pike and San Isabel National Forests Plan.

³ This Plan complies with the land management planning procedures set forth in 36 CFR 219, as required by the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by NFMA (16 U.S.C. 1600 *et seq.*).

A revision of the Grasslands Plan is needed to provide guidance that will more effectively address certain challenges which reflect the ecological, economic, and social trends underpinning the need to change the way the Grasslands are managed now and in the future. These challenges are discussed in the accompanying Plan (Part 1 section 1.2.). The identified challenges are:

1. Land ownership pattern: The fragmented pattern of NFS land ownership limits various aspects of resource and recreation management.
2. Tamarisk: This nonnative invasive plant species presents challenges to restoring riparian ecosystems.
3. New and incoming nonnative invasive plant species: These species can adversely affect watershed conditions, reduce vegetative and wildlife diversity, and spread to private lands.
4. Habitat for declining bird species: Lack of disturbance factors such as fire and grazing has resulted in reduced habitat quality for certain grasslands birds.
5. Lack of vegetative diversity: About 10% of the Grasslands are abandoned fields, seeded after the 1930s Dust Bowl era, which have persisted as areas of low vegetative diversity.
6. Recreation and tourism demands: Increased demand, use, and unmanaged dispersed recreation can bring about increased resource damage, the spread of nonnative invasive plant species, and user conflicts.

Map 1. Planning Area of the Cimarron and Comanche National Grasslands



Alternatives

As directed by CEQ regulations (1508.9(b)), the EA must include a brief discussion of alternatives as required by NEPA. The relevant NEPA requirement is that the agency study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources (40 U.S.C. 4332(2)(E)). The proposed action and following alternatives were considered.

Proposed Action

The Forest Service proposes to adopt a Grasslands Plan with five strategic components:⁴ desired conditions, objectives, guidelines, suitability of areas, and special areas.

Although the 2008 Planning Rule allows plans to include standards as a plan component, standards are not included with the proposed action. However, other direction referenced primarily found in Part 3 of the Plan includes standards applicable to project design. Stipulations for oil and gas operations addressing facility design (such as roads and well sites) and for avoiding or mitigating potential impacts to the environment comes from the 1992 Record of Decision (USDA FS 1992a) to the 1991 Oil and Gas Leasing EIS for the Pike and San Isabel National Forests and Comanche and Cimarron National Grasslands

⁴ 36 CFR 219.7

(USDA FS 1991). The proposed action would not change the 1992 oil and gas leasing decision.

Desired Conditions. This plan component describes the vision (the desired conditions) for the Grasslands in terms of land administration, ecological resources, economic and social resources, and physical resources (Plan section 1.3.). Desired conditions may apply to the entire Grasslands or to only a portion, such as a specific ecosystem or special area. These are not commitments of resources to maintain or change existing conditions. Desired conditions for land administration include large contiguous tracts of NFS lands with reasonable public and administrative access to those lands. The ecosystems in the Plan Area⁵ are the Canyonland, the Riparian and Aquatic, the Sandsage Prairie, and the Shortgrass Prairie. The ecological desired conditions describe the diversity and sustainability of the Grasslands in terms of ecological components—the vegetation composition, structure, and function, and disturbance regimes. Economic and social desired conditions include those for livestock grazing, minerals and energy resources, and recreation and tourism. Desired physical resource conditions include those for heritage resources, landscape and scenery, and paleontological resources. Desired conditions are also described for nine special areas.

Objectives. This plan component provides measures for achieving the desired conditions (Plan section 2.1.). Objectives do not commit to, or approve, any project or activity. Plan objectives for the next 15 years are described for land administration, ecological resources, economic and social resources, physical resources, and for special areas. The following examples illustrate the type of objectives included in the Plan. One land administration objective is, “A minimum of 20 miles of net property boundary length would be reduced.” An ecological resources objective is, “Integrated weed management measures would be employed annually.” An economic and social resources objective is, “Dispersed recreation sites within 100 feet of surrounding playa lakes and streams would be closed and rehabilitated unless otherwise designated.” A physical resources objective is, “A minimum of two large-scale (requiring more than three people for several weeks) fossil inventories would be conducted annually on the Grasslands.” A special areas objective for the Comanche Lesser Prairie Chicken Habitat Zoological Area is, “A minimum of 500 acres would be treated to increase native plant diversity.”

Guidelines. This plan component provides information and guidance for project and activity decisionmaking to help achieve desired conditions and objectives (Plan section 3.1.). Guidelines do not compel any action to take place. In the Plan, guidelines are identified for land administration, ecological resources, economic and social resources, physical resources, and special areas. The following examples illustrate the type of guidelines included in the Plan. A land administration guideline is, “Land adjustments should be considered when they contribute to the net reduction of Forest Service administrative costs and improvement of management efficiency.” An ecological resources guideline is, “Timing restrictions and buffers should be applied where activities cause unacceptable disturbances during reproductive periods (denning, nesting, brood-rearing) to species-of-concern and species-of-interest.” An economic and social resources

⁵ Plan Area: “The National Forest System lands covered by a plan” (36 CFR 219.16). The area within the Grasslands’ administrative boundaries that includes only those lands administered by the Forest Service, not state or private lands.

guideline is, “New facilities should be designed to resemble natural patterns.” A physical resources guideline is, “Before ground-disturbing activities begin, known significant paleontological resources should be salvaged and curated in a federally-approved repository.” A special areas guideline for the Comanche Lesser Prairie Chicken Habitat Zoological Area is, “Livestock grazing should take place in ways that help ensure the occurrence of desired changes in plant species composition.”

Suitability of Areas. This plan component identifies land generally suitable for a variety of multiple uses, but does not commit any parcel to a particular use (Plan section 2.3.). The general suitability of Grasslands areas is described for livestock grazing, oil and gas development, motorized travel, and utility corridors. General suitability may vary by ecosystem and by special area (Plan section 2.3. Tables 2-2. and 2-3.). A decision to establish or prohibit any use on a particular area would occur through project and activity management considerations and decisions.

Special Areas. This plan component identifies nine areas within the Grasslands that have unique or special characteristics (Plan section 2.2.). The Plan does not change the legal status of the three previously designated special areas. Areas were evaluated for their unique natural character, botanical resources, geological features, and for their heritage, historical, and paleontological qualities. The nine areas identified as special areas within the Grasslands are:

- Bent Canyon Bluffs, Mesa de Maya, and OU Creek are identified as botanical areas based on their unique botanical characteristics.
- The Campo Research Natural Area (RNA), established as an RNA in 1987, would continue as a designated special area (USDA FS 1987a).
- The Comanche Lesser Prairie Chicken Habitat Zoological Area, designated as a special area in 1984, would retain the zoological area designation because the area once supported one of the highest densities of lesser prairie chickens in the state of Colorado. This area was formally designated as a Colorado Natural Area in 1987 (USDA FS 1987b).
- The Picket Wire Canyonlands Paleontological Area is identified as a special area based on its important paleontological resources. In 1992, the Picket Wire Canyonlands was designated a special interest area (USDA FS 1992b).
- Picture Canyon and Vogel Canyon are identified as historical areas based on important heritage resources and recreation opportunities.
- The Santa Fe Trail, designated by Congress in 1987 as a National Historic Trail, would retain this special area designation for all trail segments on the Grasslands. The unique and special characteristics of the Trail include the trail-related cultural and natural resources along the trail route. Management of the Trail is addressed in the Santa Fe National Historic Trail Comprehensive Management and Use Plan (USDI NPS 1990).

Alternatives Considered Regarding Ecosystems

The Forest Service worked closely with The Nature Conservancy (TNC) to assemble and share data, and develop similar approaches (where possible) for the Proposed Grasslands Plan and the simultaneous revision of TNC's Central Shortgrass Prairie Ecosystem Management Plan. The ecological systems used by TNC were compared to the ecosystems being considered for the Grasslands. The comparison initially identified five ecosystems for the Grasslands: the Arid Shortgrass Prairie, the Canyonland, the Mesic Shortgrass Prairie, the Riparian and Aquatic, and the Sandsage Prairie. Through additional team discussions and public collaboration, four Grasslands ecosystems were identified and are used in the Plan: the Canyonland, the Riparian and Aquatic, the Sandsage Prairie, and the Shortgrass Prairie. The Shortgrass Prairie Ecosystem includes both the Arid Shortgrass Prairie and the Mesic Shortgrass Prairie Ecosystems.

Alternatives Considered Regarding Species-of-Concern, Black-Tailed Prairie Dog

Options related to the black-tailed prairie dog (*Cynomys ludovicianus*) were considered based on available information (USDA FS 2005a), comments from the U.S. Fish and Wildlife Service (USFWS), and discussions at public workshops. The USFWS proposed that the Forest Service focus management on black-tailed prairie dog habitat in several areas of the Grasslands. This would contribute toward sustaining black-tailed prairie dog populations and to potentially provide, at some time in the future, a reintroduction site for black-footed ferret, a species currently not known to exist on the Grasslands (USFWS 2008).

The public expressed widely divergent views of black-tailed prairie dog management, which ranged from suggesting a year-round open hunting season on the species to full protection. Public collaboration consistently came back to the question of what the Forest Service is going to do about black-tailed prairie dogs. Considering public comment, available data, opinions, and scientific research, the Proposed Grasslands Plan identifies black-tailed prairie dog as a species-of-concern. The Plan establishes desired conditions (particularly related to land fragmentation and consolidation), objectives, and guidelines for habitat conditions. This provides the information and guidance for project and activity-level planning, decisionmaking, and implementation to contribute to the species' sustainability.

Alternatives Considered Regarding Species-of-Interest, Tamarisk

The Proposed Grasslands Plan identifies tamarisk (*Tamarix ramosissima*), a nonnative invasive plant species, as a species-of-interest. This species was not considered as a species-of-interest during the early stages of Plan development. However, due to the ecological impact of tamarisk on riparian areas and riparian-dependent species, and in light of the Plan's desired conditions and objectives described for the Riparian and Aquatic Ecosystem, tamarisk was identified as a species-of-interest. An aspiration of the Plan's desired conditions and objectives is that this species not be present on the Grasslands.

Alternatives Considered Regarding Special Areas and Research Natural Areas (RNAs)

Between 1997 and 1999, the Colorado Natural Heritage Program (CNHP) and the Forest Service's Rocky Mountain Research Station (RMRS) conducted a series of ecological evaluations and identified 13 areas across both Grasslands that should be considered further for possible designation as RNAs. These areas were further evaluated while desired conditions and objectives were being developed for the four Grasslands ecosystems and while special considerations were identified that might warrant a possible RNA recommendation. After consultation with RMRS concerning the characteristics of these 13 areas and their potential as RNAs, nine special areas were identified for the Proposed Grasslands Plan, but none were recommended as RNAs. Maintaining existing conditions and, where necessary, moving toward the desired conditions described for the nine special areas would maintain or enhance the unique values that were identified for these areas.

No Action Alternative (1984 Plan)

The 1984 Plan (USDA FS 1984) represents the "no action" alternative. The 1984 Plan guided implementation activities through Forest Direction and Management Area Direction (1984 Plan, Chapter III). That management direction consisted of the following:

1. Long-range goals (for example, desired conditions) and objectives for the Forest for the next 50 years;
2. Standards and guidelines;
3. Monitoring and evaluation requirements needed to determine how well 1984 Plan direction is carried out and to determine whether outputs and effects are as predicted;
4. Determinations on the suitability for Wilderness designation (no areas on the Grasslands were found suitable);
5. Availability of federal oil and gas resources for leasing and stipulations (standards and guidelines) for oil and gas development (USDA FS 1992a).

Except for the relatively recent oil and gas leasing decision that amended the 1984 Plan, there is little management direction specific to the Grasslands in the 1984 Plan.⁶ The Proposed Grasslands Plan would apply specifically to the Grasslands rather than being one part of a combined plan covering the Grasslands as well as the Pike and the San Isabel National Forests.

⁶ The 1984 Plan's management direction specifically addressing the Grasslands units is found on pages III-4 (cultural resource goal), III-5 (community stability goal), III-6 (general management goal in accordance with the Bankhead-Jones Farm Tenant Act), and III-12 through III-30 (management requirements).

Sustainable Use Conservation Alternative

During the 2005 comment period on the then proposed (draft) Grasslands Plan and the FONSI and EA, a detailed alternative, The Sustainable Use Conservation Alternative (the Conservation Alternative) (Forest Guardians 2006), was submitted by Forest Guardians.

The focus of the Conservation Alternative is on “restoring and conserving the native biodiversity, healthy ecosystems, and natural ecological processes in the region while continuing compatible, sustainable commercial and recreational activities” (Forest Guardians 2006, p. 6). This focus has much in common with the Proposed Grasslands Plan; however, it differs in that under the Conservation Alternative, management on the Grasslands would be focused on ecological restoration and improved habitat for native plants and animals. Emphasis would be on nonmotorized recreation and a more natural setting with reduced visibility of facilities, such as those for oil and gas development.

This alternative was reviewed and a detailed “Response to the Forest Guardians Sustainable Use Conservation Alternative” (USDA FS 2006a) was prepared, as well as a set of worksheets (USDA FS 2006b) which provides an item-by-item comparison of desired conditions and other primary aspects of this alternative with the corresponding provisions of the Proposed Grasslands Plan. Both the “Response to the Forest Guardians Sustainable Use Conservation Alternative” and the detailed set of worksheets have been updated (USDA FS 2008b and USDA FS 2008c) to compare the Conservation Alternative’s desired conditions with the provisions of the Proposed Grasslands Plan.

The majority (more than 85%) of the desired conditions from the Conservation Alternative were found to be similar or in general agreement with those in the Proposed Grasslands Plan. Among the Conservation Alternative recommendations, about 27% a) fall outside the scope of the Proposed Grasslands Plan, b) can only be addressed at the project or activity planning levels, or c) pertain to private or non-NFS lands.

The following are examples of the desired conditions in the Conservation Alternative that are different from or not included in the Proposed Grasslands Plan (proposed action):

1. Livestock grazing: The timing, duration and intensity of livestock grazing would be directed toward achieving the single goal of restoring habitat for native species and the Grassland’s ecological function.
2. Non-motorized recreation emphasis: Non-motorized recreation would be encouraged.
3. Special management areas: Land surrounding RNAs and other special areas would be designated as primitive non-motorized areas to serve as buffers.
4. Watershed conditions: Watersheds would move toward pristine (Class 1) conditions.
5. Wild bison: Cattle would be gradually replaced with wild bison.
6. Oil and gas: Oil and gas facilities would be removed from areas where they harm species-of-concern.
7. Light sources: New permanent light sources would be prevented from hindering clear views of the night sky.

8. Protected species: Protected species would be present at functionally significant levels.

The Conservation Alternative would include standards requiring that certain actions take place in a specific manner and prohibitions of some uses in all or parts of the Grasslands. The intent is that protections be clear and enforceable. The Conservation Alternative recommends a number of specific objectives and monitoring requirements and would apply to twelve distinct ecosystems rather than four.

Environmental Impacts of the Alternatives

The proposed action and alternatives contain plan components (desired conditions, objectives, guidelines, suitability of areas, and special areas) that provide a strategic framework and guidance. The Plan's components cannot be linked in a cause-effect relationship over time and within the geographic area to effects on air quality; threatened and endangered species; significant scientific, cultural, and historic resources; water quality; or to other resources. Such relationships cannot exist without specific project or activity proposals, and without such relationships environmental impacts cannot take place. However, after projects and activities are proposed, decided on, and implemented over time under the strategic Plan, we can reasonably expect environmental conditions to reflect the strategic components of the Plan.

Existing and Desired Conditions for the Proposed Grasslands Plan and the Conservation Alternative

While there are no environmental impacts from the Proposed Grasslands Plan itself, the Plan describes a strategic vision and environmental changes in the Planning Area that can reasonably be expected to take place as the Grasslands moves toward or maintains desired conditions (Plan section 1.3.).

These descriptions of desired conditions are not intended to be the effects analysis of future projects or activities, because that analysis will not be possible until actual projects or activities are proposed. However, the difference between existing and desired conditions illustrates what may be accomplished through successive individual management decisions that affect resource conditions over time.

Success in moving toward or maintaining desired conditions depends on future management decisions, including project and activity decisions that will help effect a change toward or maintain the desired conditions over time. It is also influenced by factors which may be beyond Forest Service management capability, such as budgetary shifts, environmental disturbances, and uncertainties surrounding the direction, extent, and rate of climate change, especially at local levels.⁷ Monitoring and evaluation will gauge progress and determine the success in achieving desired conditions.

As discussed earlier in this EA under "Alternatives," each alternative considered includes some description of desired conditions. The no action alternative (the 1984 Plan) does not include plan components specifically intended to address major land management challenges identified in the planning process (Plan section 1.2.). The proposed action

⁷ For more information about climate change and the Grasslands, see Appendix B of the Plan.

alternative (the Proposed Grasslands Plan) describes in detail existing and desired conditions for land administration, ecological resources, economic and social resources, physical resources, and special areas (Plan section 1.3.). The Conservation Alternative describes detailed desired conditions for eleven topic areas. While there are many similarities, the desired conditions for the Conservation Alternative differ from those for the Proposed Grasslands Plan in terms of their emphasis on restored ecological conditions, sustained commercial uses, and mix of recreation settings.

A selection of desired conditions from the Proposed Grasslands Plan and for the Conservation Alternative is summarized below. These conditions are those related to addressing the most pressing challenges in resource management for the Grasslands (Plan section 1.2.). Because addressing these management challenges is an important aspect of the need for the Proposed Grasslands Plan, some level of change from existing conditions to desired conditions can be reasonably expected.

Land Administration

Existing Conditions/Management Challenge

Beginning in 1934, the U.S. Department of Agriculture purchased or acquired drought-stricken and economically unsuccessful farms from willing sellers, retired them from cultivation, and began restoring them to grass cover. This resulted in a fragmented pattern of land ownership, wherein lands under Forest Service jurisdiction make up an average of 20% of the 117 sixth level watersheds⁸ on the Grasslands.

This disconnectedness challenges resource management: inconsistent habitat quality and quantity; management of disturbance processes; law enforcement; recreation uses associated with contiguous public lands; management costs and time. It also makes it difficult to manage for sustainable populations of some wildlife species: isolated blocks of land managed by the Grasslands are rarely large enough to maintain populations of large, mobile vertebrates on their own. With 80% of the Grasslands' watersheds in private ownership, the potential for Grasslands management to affect change at the watershed scale (and associated perennial streams) is very limited.

Desired Conditions – the Proposed Grasslands Plan

Land ownership adjustments would provide an optimum land ownership pattern for resource uses and values to meet present and future needs. There would be large, contiguous tracts of NFS lands. As opportunities for land acquisitions arise, priority consideration would be given to lands with important resource values (such as habitat for threatened or endangered species, or species-of-concern), and the ability to sustainably enhance resource uses.

Administration and the costs of boundary management would be reduced. There would be reasonable public and administrative access to NFS lands. Strategic easements for access would have been acquired. Clear title to NFS lands would be retained. Unidentifiable boundaries would be resurveyed and clearly posted, substantially reducing occupancy trespass. Consolidated tracts would

⁸ Levels of watershed classification are derived using the U.S. Geological Survey hydrological unit cataloging system, a system used to delineate watersheds from the largest scale (level 1) to the smallest (levels 6 to 8).

1. provide for more potential and contiguous recreational opportunities and access.
2. provide for the protection of important cultural resources.
3. result in a low potential for conflicts with or impacts from activities on NFS lands with adjacent private lands (such as landscape-scale treatments like prescribed burning).
4. provide larger blocks of contiguous habitat for species-of-concern: the black-tailed prairie dog, lesser prairie chicken (*Tympanuchus pallidicinctus*), mountain plover (*Charadrius montanus*), and swift fox (*Vulpes velox*); and species-of-interest: pronghorn (*Antilocapra americana*) and elk (*Cervus elaphus*).

Larger blocks of NFS lands would then enhance the integrity and effectiveness to sustain these species, as addressed in Appendix D for species-of-concern (in the Proposed Grasslands Plan) and in the 2008 species diversity evaluation for wildlife (USDA FS 2008d).

Desired Conditions – the Conservation Alternative

Similar to the Proposed Grasslands Plan, the Conservation Alternative envisions larger and more contiguous blocks of land composing the Grasslands. The Conservation Alternative would prioritize land ownership adjustment to improve the health and function of native ecosystems and maximize native biodiversity, while land ownership adjustments under the Proposed Grasslands Plan would focus on enhancing sustainable resource uses as well as resource values and critical ecosystems and habitats.

Tamarisk

Existing Conditions/Management Challenge

Tamarisk is an introduced nonnative invasive (woody) plant species listed on the Colorado state list of noxious weeds, and listed as a quarantined species in Kansas in 2004. It has become well established on both of the Grasslands. Tamarisk presents management challenges to restoring riparian ecosystems because it out-competes native trees and shrubs and it currently dominates many Grasslands riparian corridors (such as the Cimarron River corridor). Undesirable results of tamarisk infestation include lowered water tables, the loss of native riparian vegetation habitat, such as plains cottonwood (*Populus deltoids* ssp. *monilifera*) and willow (*Salix* sp.), the general degradation of riparian areas, and alteration of soil characteristics. Like other nonnative invasive plant species, tamarisk's ability to spread and re-establish quickly makes broad landscape scale treatment necessary to ensure effective long-term treatment.

Desired Conditions – the Proposed Grasslands Plan

Populations of native woody species, particularly the long-term presence of mature plains cottonwood stands and areas with regenerating plains cottonwood and willow saplings would provide habitat for desirable riparian-associated wildlife species, such as elk and wild turkey (*Meleagris gallopavo*). A diverse mix of native graminoids and forbs adapted to abrupt fluctuations in moisture regimes would occur in the herbaceous portion of riparian areas, and provide habitat for desirable riparian-associated wildlife species, such as northern bobwhite (*Colinus virginianus*).

In riverine habitats, native woody and herbaceous vegetation would provide improved streambank stabilization and habitat (such as bank cover and stream shading). These

conditions would influence and help restore the fluvial processes and flooding regimes favorable to help sustain riparian and aquatic wildlife and plant species. Tamarisk and other nonnative invasive plant species would be low to non-existent in abundance and distribution.

Desired Conditions – the Conservation Alternative

The Conservation Alternative includes desired conditions concerning nonnative invasive species, but not specific to tamarisk. There would be an anticipated reduction in presence of invasive species and a significant decrease in conditions favoring the introduction, establishment and spread of invasive species.

New and Incoming Nonnative Invasive Plant Species

Existing Conditions/Management Challenge

Nonnative invasive plant species lead to the establishment of undesirable vegetation monotypes and this can result in major declines of watershed conditions. Infestations of nonnative invasive plants can reduce or replace native or desirable nonnative species (including threatened, endangered, or species-of-concern) and habitats and so affect diversity in native plant and wildlife species composition. Uncontrolled nonnative invasive plant species can also increase treatment costs and spread to adjacent private lands where they reduce crop production.

Desired Conditions – the Proposed Grasslands Plan

The Grasslands would support desired native plant communities adapted to withstand prolonged drought, insect infestations, wildfire, herbivory, and other disturbances.

Populations of nonnative invasive plant species and other exotic organisms, where they occur, would be small in size, low in density, and would not dominate ecosystem processes and composition. Long-term soil productivity would continue.

Desired Conditions – the Conservation Alternative

The area in which invasive species are present would be decreasing on the Grasslands. Conditions favoring the introduction, establishment, and spread of invasive species are decreasing. Those native species that have lost ground to exotic invasive species would be gaining ground. New invaders would not obtain significant footholds in the Grasslands. Native plants would dominate in all vegetation communities. Persistent and/or invasive exotic plants earlier introduced and/or seeded by users of the Grasslands (e.g. cheatgrass, Kentucky bluegrass, smooth brome, crested wheat grasses) would be declining in area on the Grasslands relative to native species.

Habitat for Declining Bird Species

Existing Conditions/Management Challenge

Until the mid-1800s, grazing by large herbivores and fires were important interacting disturbance processes that contributed to a grassland landscape with highly variable plant species composition and vertical structure. Fire suppression and the timing and intensity of livestock grazing have reduced variability in grass height and species composition across the Grasslands. Over the past fifty years, approximately 154,225 acres (75%) of the Sand Sage Prairie Ecosystem and the Canyonland Ecosystem and approximately 100,530 acres (30%) of the Shortgrass Prairie Ecosystem have burned less frequently than they did over previous centuries. This may have contributed to reduced habitat quality for and declining populations of the lesser prairie chicken and mountain plover (see References in Appendix D in the Proposed Grasslands Plan, and USDA FS 2005b, USDA FS 2008d).

Desired Conditions – the Proposed Grasslands Plan

For all ecosystems, land conditions would be influenced by natural disturbance processes that promote a shifting mosaic of heterogeneous plant communities and structural stages across the landscape. Small watersheds would be resilient and dynamic, sustaining desired conditions in response to natural and human-caused disturbances. A majority of the Grasslands would be at low or moderate departure from conditions associated with the pre-1800s fire disturbance regime.

Within the Sand Sage Prairie Ecosystem, a mosaic of plant communities with variable species composition and structure would be present throughout the ecosystem. This diversity of areas and mosaic of vegetation would continually change across the landscape, temporally and spatially based on the level of disturbance (both human and natural) or no disturbance at all. A broad diversity of native grasses and forbs, consistent with the site potentials of these areas, would contribute to plant communities in amounts and patterns that would provide for wildlife habitat needs, protect the soil from erosion, improve forage conditions, and discourage infestations of nonnative invasive plant species.

Within the Sand Sage Prairie Ecosystem, the vegetation structure would be at the proportions shown in Table 1-1 (in the Proposed Grasslands Plan, section 1.3.2.d.) and would continue as a dynamic mosaic on the landscape over time. The amount of moderate structure and tall-structure vegetation would provide areas of high-quality nesting and brood-rearing habitat for the lesser prairie chicken (see Appendix D in the Proposed Grasslands Plan and the wildlife diversity report (USDA FS 2008d) for further details on habitat). Recreational viewing of lesser prairie chicken display grounds would continue to be available, but occur only in such a way that disturbances and adverse impacts to the birds are minimal.

Table 1-1.⁹ Vegetation structure levels for the Sandsage Prairie Ecosystem

Low	Moderate	Tall
40%–60% 0–4 inches	25%–50% 5–11 inches	8%–15% 12 inches and greater

The spatial variability of the ecological conditions would reflect the presence of grazing and fire disturbance processes. The pattern of livestock grazing would contribute toward achieving the desired vegetative structure described in Table 1-1.

Within the Shortgrass Prairie Ecosystem, areas of sparse, low-structure vegetation would provide abundant nesting and foraging habitat for mountain plover and swift fox, as described in Appendix D¹⁰ in the Proposed Grasslands Plan. Localities supporting sparse, low-structure vegetation consistent with the nesting requirements of mountain plover would not include areas of shortgrass prairie with documented occurrences of wheel milkweed (*Asclepias uncialis* ssp. *uncialis*) (a species-of-concern), and would be rotated over time, across the ecosystem, to allow vegetative recovery.

Desired Conditions – the Conservation Alternative

Ecological conditions would exist to achieve natural patterns of abundance and distribution of all native plant and animal species. Degraded habitat that historically supported wildlife species or currently supports diminished populations of native and migratory species would be restored. Species would be monitored regularly and populations would be stable or geographically expanding to fill potentially suitable habitat within historic range. Conservation measures would demonstrate positive trends in habitat availability and quality, or any other applicable factors affecting species at risk and rare communities.

Careful, well-planned management of disturbance regimes, primarily grazing and fire, would enable the formation of a mosaic of short-to-tall structure vegetation to provide a closer approximation of natural conditions for maximizing species biodiversity. Fire would occur within a range of frequencies, severities, and extents that, to the degree practicable, approximates the natural variability of each ecosystem. Grassland management would seek, wherever possible, to support healthy ecosystem conditions; understand, expect, and restore natural disturbances; and prepare for natural ecosystem responses to climate change.

Lack of Vegetative Diversity

Existing Conditions/Management Challenge

Plant communities over much of the Grasslands are well represented by a diversity of native species. However, about 55,190 acres (10%) of Grasslands are made up of monocultures of sideoats grama (*Bouteloua curtipendula*), James' galleta (*Pleuraphis jamesii*), or Old World bluestem (*Bothriochloa* sp.). These abandoned fields, seeded

⁹ Table 1-1 comes from the Proposed Grasslands Plan, section 1.3.2.d.

¹⁰ See also the wildlife diversity report for additional information on species' habitat needs (USDA FS 2008d)

after the 1930s Dust Bowl era, have persisted as areas of low vegetative diversity. Riparian communities overtaken by tamarisk also show a lack of vegetative diversity.

Desired Conditions – the Proposed Grasslands Plan

Within all ecosystems, the Grasslands would support desired native plant communities adapted to withstand prolonged drought, insect infestations, wildfire, herbivory, and other disturbances (such as climate change).

Within the Sandsage Prairie Ecosystem, plant communities dominated by a mixture of native, tall-structure, perennial grasses, and sand sagebrush would occupy at least 16,470 acres (10%) of the ecosystem. Communities lacking perennial grasses and dominated by a high density of annual forbs or sand sagebrush or both would represent 16,470–32,935 acres (10%–20%) of the ecosystem. On the Carrizo unit of the Comanche National Grassland (Comanche), near-monoculture stands of sideoats grama would make up less than 5,000 acres (5%) of the 100,050-acre portion of this ecosystem.

Within the Shortgrass Prairie Ecosystem, the extent of monoculture stands of sideoats grama, James' galleta (seeded during post-Dust Bowl restoration efforts), nonnative perennials, and other nonnative invasive plant species would be declining (USDA FS 2005b and USDA FS 2006c) with corresponding increases in plant diversity in response to changes in the timing and intensity of livestock grazing and prescribed burning.

Desired Conditions – the Conservation Alternative

The trend toward monoculture would be reversed. Careful, well-planned management of disturbance regimes, primarily grazing and fire, would enable the formation of a mosaic of short-to-tall structure vegetation to provide a closer approximation of natural conditions for maximizing species biodiversity. Degraded habitat, which historically supported native species (or their pollinators) whose populations have been reduced or are declining, would be in the process of being restored. The goal of restoring the Grasslands to achieve healthy habitat for native species and fully functioning ecosystems would dictate the timing, duration, and intensity of livestock grazing on the Grasslands. Persistent and/or invasive exotic plants earlier introduced and/or seeded by users of the Grasslands (e.g. cheatgrass, Kentucky bluegrass, smooth brome, crested wheat grasses) would be declining in area on the Grasslands relative to native species.

Recreation and Tourism Demands

Existing Conditions/Management Challenge

Parts of the Grasslands, especially the Timpas unit of the Comanche, may likely experience continually increasing public use resulting from urbanization and increasing populations along the Front Range. Increased demand, use, and unmanaged dispersed recreation can bring about increased renewable and physical resource damage, the spread of nonnative invasive plant species, and user conflicts.

Desired Conditions – the Proposed Grasslands Plan

The recreation capacity of the Grasslands and an increase in the level of tourism would be acceptable to local community needs, contribute to local economies and would not detract from recreational uses and experiences. Residents of the communities and counties surrounding the Grasslands would continue to enjoy a range of recreational opportunities involving or including: a diversity of native wildlife, scenic beauty, solitude and quiet, and a well-tended infrastructure including roads, trails, picnic areas, and campgrounds. Future facilities and developments would be limited to areas that need such infrastructure to prevent resource damage and continue to maintain existing mix of recreation opportunities. Desired conditions for the four ecosystems would be accommodated.

Tourism activities would focus on developed sites that allow people to camp, hunt, watch wildlife, and explore the area's natural and cultural history while protecting historic and heritage resources from vandalism and overuse. Dispersed recreation sites would be available for use throughout the Grasslands and would be in good condition, at or below the adopted scenic integrity level. The dispersed sites within 100 feet of a lake or stream would be designated sites. Some sites may be closed or rehabilitated based on undesirable environmental conditions.

The road system would provide for safe public travel and resource protection. Specific travel restrictions would be identified to contribute to desired recreation experiences. Access would continue to be provided into such areas as existing campgrounds, picnic areas, and trails. Access would provide recreation opportunities and limited access would help conserve wildlife, plants, heritage and paleontological resources in the following special areas: Bent Canyon Bluffs Botanical Area, the Picket Wire Canyonlands Paleontological Area, Picture Canyon Historical Area, the Santa Fe National Historic Trail, and Vogel Canyon Historical Area. Motorized vehicle travel would be on designated roads, trails, or areas that would provide for positive recreational opportunities while limiting resource damage and user conflicts. Non-motorized trail loops would be emphasized, as appropriate, in the existing network of trails and roads.

Specifically, the areas identified as the Santa Fe National Historic Trail would continue to be a desirable destination for its unique historic and scenic attributes.

Desired Conditions – the Conservation Alternative

Recreational activities (particularly human-powered recreation) and services would contribute to visitors' physical and mental well-being and relationship with the Grasslands. Well-managed, sustainable recreation on the Grasslands would contribute to the local economy. Maintaining and expanding recreational opportunities would depend on the continued restoration and protection of native species and habitat as well as historic and cultural resources. Recreation would be managed in a holistic manner using least-impact principles, in order to protect natural, cultural and historical heritage values, and to minimize conflicts. Non-motorized visitation and recreation would be facilitated and encouraged for visitor health and ecosystem protection. Human-caused soil erosion due to recreational and commercial activities would be minimized. The Comanche and Cimarron National Grasslands would remain an important nexus for historic exploration of human and pre-human history for generations to come. The opportunity would exist

for a sense of discovery as one visits remote cultural resource sites on the Grasslands and finds neither evidence of recent looting or vandalism, nor evidence of illegal motor vehicle trespass. Recreational visitation would occur where cultural and historic resources are maintained or stabilized sufficiently to preclude further damage.

Use of Standards and Guidelines

The Conservation Alternative would include standards requiring that certain actions take place in a specific manner and prohibitions of some uses in all or parts of the Grasslands. The no action alternative also includes standards from the 1984 Plan. The Proposed Grasslands Plan uses guidelines and does not include standards or prohibitions.

Standards are constraints upon project and activity decisionmaking. When a plan contains standards, a project or activity must be designed in accord with the applicable standard(s) in order to be consistent with the plan. If a proposed project or activity would be inconsistent with the plan, the responsible official must modify the proposal, reject the proposal, or amend the plan.

The difference in use between standards and guidelines is largely one of form rather than function, as both standards and guidelines will be followed unless deviations are discussed in the appropriate environmental document. The only difference is that deviation from a standard requires a plan amendment while deviation from a guideline requires documentation that the design used for the project or activity is an effective means of meeting the purpose of the guideline to maintain or contribute to the attainment of relevant desired conditions and objectives.

Standards and guidelines would not create environmental effects. The effect of a standard or guideline could only be determined at the project level, relative to a specific proposal and environmental conditions.

Ecosystems Used in Planning

Options were considered for the number of distinct ecosystems for which plan components would be developed. The Conservation Alternative suggested the use of twelve distinct ecosystem types identified by the CNHP. The Proposed Grassland Plan uses four distinct ecosystems developed in collaboration with TNC and the public.

Ecosystems are made up of (biotic) organisms and their abiotic environment interacting within a defined area. Boundaries within these defined areas can be delineated in a variety of ways for a variety of purposes. The four ecosystems delineated for the Proposed Grasslands Plan are based on distinct boundaries in soil types and topography. These ecosystems are used because they reflect distinct ecological (both biotic and abiotic) differences in plant productivity and types of wildlife habitat, and because differences among the four ecosystems are directly relevant to the management of fire, livestock grazing, and recreation on the Grasslands. The four ecosystems provide a useful and appropriate framework for the future projects and activities. If needed, analysis of projects and activities carried out at specific locations can examine finer level ecosystem components by considering those more detailed components described in the twelve ecosystems identified by the CNHP.

Black-Tailed Prairie Dog

The USFWS proposed that the Forest Service focus management on black-tailed prairie dog habitat in several areas of the Grasslands to contribute toward sustaining black-tailed prairie dog populations and to potentially provide, at some time in the future, a reintroduction site for black-footed ferret.

Desired conditions for both the Proposed Grasslands Plan and the Conservation Alternative are for a healthy population of black-tailed prairie dogs within and around the Grasslands. Barriers to black-tailed prairie dog movement would be reduced under the Conservation Alternative and grasslands species dependent on black-tailed prairie dogs would experience stable and increasing populations. Black-tailed prairie dog populations would be sufficient to support a sustainable population of black-footed ferrets in the Grasslands region under the Conservation Alternative, but this is not a desired condition of the Plan.

The Proposed Grasslands Plan identifies black-tailed prairie dog as a species-of-concern. It establishes desired conditions, objectives, and guidelines for habitat conditions to provide information and guidance for implementing activities to contribute to the species' sustainability, particularly desired conditions related to land fragmentation and consolidation. The Plan includes the objective of contributing to the state's goals for maintaining a greater than 5,000 acre black-tailed prairie dog complex. This approach balances the effects of the species on grasslands productivity and neighboring landowners with the needs to maintain sustainable populations of the species and contribute to the needs of other species that depend upon black-tailed prairie dog colonies.

The current prevalence of plague in the black-tailed prairie dog population combined with the existing land ownership pattern result in a lack of suitable habitat for black-footed ferret reintroduction on the Grasslands. Provisions within the Proposed Grasslands Plan for black-tailed prairie dog populations may eventually allow for long-term future consideration of ferret reintroduction on the Grasslands contingent on changes in land ownership patterns and development of effective plague mitigation methods.

Special Areas and RNAs

Under the Conservation Alternative, RNAs would be established representing each of twelve ecosystems. Lands surrounding RNAs and other special areas would be designated as primitive non-motorized areas to serve as buffers. Although the Proposed Grasslands Plan does not recommend any new RNAs, it identifies nine special areas. Any limitations on motorized use in and around special areas to provide solitude and resource protection would be determined during Plan implementation.

Plan Specialists' Reports

Resource specialists' reports prepared during development of the Proposed Grasslands Plan discuss existing conditions and expected trends if the Grasslands were to continue to be managed under the 1984 Plan.

The Proposed Grasslands Plan, resource specialists' reports, and all relevant assessments that are part of the plan set of documents provide general environmental information for use in analyses and decisions for projects and activities.

To access, view, and download the Proposed Grasslands Plan, the resource specialists' reports and other Plan-related information and evaluations, visit:

http://www.fs.fed.us/r2/psicc/projects/forest_revision/gr_rev.shtml.

Agencies and Persons Consulted

Public involvement and collaboration was initiated through mailings to interested parties in 2004, 2005, and 2006. In late June 2005, four public collaboration workshops were held in Elkhart, Kansas, and in Springfield, La Junta, and Pueblo, Colorado; more than 80 people attended. In June and July 2006, another four public collaboration workshops were again held in Elkhart, Springfield, La Junta, and Pueblo; more than 60 people attended.

Between June 2005 and March 2007, four newsletters were each sent to approximately 1,100 persons or organizations providing updates on the Proposed Grasslands Plan timelines, public meetings and workshops, and general information about the planning process.

More than 200 people submitted comments on the proposed (draft) Grasslands Plan during the formal 90-day comment period from December 31, 2005 through April 3, 2006.

Two formal science consistency reviews were conducted during development of the Proposed Grasslands Plan. During these reviews a total of 20 experts and specialists in research and development; university faculty; scientists at other agencies; employees of private companies, consultants, and nongovernmental organizations participated. The first review took place in August and September 2005. Nine experts and specialists reviewed supporting Plan documents (reports and assessments) that were foundational in determining the need for change addressed in and the direction of the proposed (draft) Plan. The second took place from March through July 2006. Eleven experts and specialists agreed to review the proposed (draft) Plan and the associated monitoring questions and performance measures.

The Grasslands District Rangers have collaborated with their respective local and state governments, county commissioners, livestock grazing association boards, and local interested citizens, in addition to the Forest Guardians and TNC. The district staffs have worked with the Colorado and Kansas SHPOs and the USFWS. In May 2008, both the Colorado and Kansas offices of the SHPO submitted their concurrences stating that implementation of the Proposed Grasslands Plan would not result in adverse impacts to cultural resources. Also in May 2008, the supervisor of the Colorado Field Office (CFO), USFWS¹¹, stating that because of the strategic and aspirational nature of the Proposed Grasslands Plan, section 7 consultation under ESA is appropriate during project-level

¹¹ The Cooperating Agency MOU between PSICC and the USFWS identifies the CFO of the USFWS as the primary contact for both the CFO and the Kansas Field Office of the USFWS.

planning. In summary, these agencies understand and recognize that consultations under appropriate laws and regulations will take place at the project or activity-level following Plan approval.

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Bruce Schumacher – geology; paleontology
Cass Cairns – collaboration; public affairs; public participation; editor
Dick Bennin – caves; minerals; oil and gas; transportation
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Michelle Stevens – heritage; tribal relations
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Steve Olson – rare plants; RNAs; special areas; special forest products
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Scott Woodall – invasive species; rangeland management
Wyoma Hansen – lands; land adjustments

Federal, State, and Local Agencies

Colorado Division of Wildlife
Colorado Office of Archaeology and Historic Preservation
Kansas Department of Wildlife and Parks
Kansas State Historical Society
U.S. Department of Agriculture, Natural Resources Conservation Service
U.S. Department of the Interior, Bureau of Land Management
U.S. Fish and Wildlife Service

Tribes

Apache Tribe of Oklahoma
Comanche Tribe of Oklahoma
Fort Sill Apache
Jicarilla Apache
Kiowa
Northern Arapaho
Northern Cheyenne
Southern Cheyenne and Arapaho
Southern Ute
Wichita and Affiliated Tribes

Others

Colorado Natural Heritage Program
Kansas Natural Heritage Program
The Nature Conservancy
U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station

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