

Proposed Plan Amendment and Associated EA/FONSI for the Escalante Management Framework Plan

In regards to the subject action, the Utah Division of Wildlife Resources has the following comments.

We support the BLM's Alternative B - Proposed Action, to reallocate relinquished grazing permits to uses other than livestock grazing, to redistribute other Animal Unit Months (AUMs), and to change the season of use on the Big Bowns Bench allotment. We recommend the Escalante Management Framework Plan be amended to incorporate the proposed alternative.

The areas proposed for reallocation of AUMs are located in the Grand Staircase-Escalante National Monument (GSENM). There are important wildlife values in the area that would be enhanced by the proposed changes in livestock grazing. Riparian vegetation and understory cover along the Escalante River and several tributaries would be protected and improved. Riparian habitats are highly valued for wildlife, even more so in arid regions such as the GSENM. The greatest diversity and abundance of species are found in riparian zones. Healthy and abundant streamside and floodplain vegetation benefits fisheries and water quality by providing cover and food resources, regulating water temperature, filtering and trapping sediments and nutrients, and increasing water storage for release over longer periods. The Endangered Southwestern willow flycatcher, an obligate riparian species, occurs along this section of the Escalante River, along with many other bird and mammal species. Two Utah sensitive fish species, the flannelmouth sucker and bluehead sucker, as well as other native fishes are found in the Escalante River.

Moreover, upland grasses, forbs, and vegetative cover would increase and provide additional forage and cover for mule deer, desert bighorn sheep, rabbits, and other small mammals, which are in turn prey species for predators such as mountain lions, bobcats, coyotes, foxes, and raptors. In addition to benefitting wildlife, increasing vegetative cover can improve watershed quality, reduce soil erosion, allow better infiltration of precipitation into the soil, and enhance recreational and aesthetics values.

Both Alternatives A and B would evaluate all range improvements and livestock management facilities for historic or interpretive values and remove those having no value. The UDWR recommends that developed livestock watering facilities be thoroughly evaluated to determine both the benefits they provide for wildlife and the impacts that would occur if they were removed. Many animals may be dependent on isolated watering facilities for their existence, and removing them could alter the local community composition and distribution of wildlife.

Thank you for the opportunity to review this proposed action and provide comment. If you have any questions please call Stan Beckstrom, Habitat Biologist, at our Cedar City Office (435) 865-6100.