



**National Park Service
US Department of the Interior**

**Black Canyon of the
Gunnison National Park
and Curecanti National
Recreation Area,
Colorado**

**FINDING OF NO SIGNIFICANT IMPACT
Black Canyon of the
Gunnison National Park and
Curecanti National
Recreation Area**

**Grazing Management Plan
Environmental Assessment
PEPC 145241**

Recommended:

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FINDING OF NO SIGNIFICANT IMPACT

1.1 INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code 4321 et seq), the National Park Service (NPS) prepared an Environmental Assessment (EA) to programmatically evaluate a grazing management plan (GrMP) for Black Canyon of the Gunnison National Park (BLCA) and Curecanti National Recreation Area (CURE) (hereafter collectively referring to as “the park units”)^{1,2}. The GrMP will provide management direction for assuming permitting responsibilities in both park units through special use permits (SUPs). The purpose of the project is to provide a long-term GrMP that ensures that livestock grazing is consistent with relevant laws, regulations, interagency agreements, and policies. In developing a GrMP, NPS will fulfill its commitment to preserve and protect the natural, cultural, and recreational resources as stated in the purpose of each park unit.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. Relevant sections of the EA are summarized and incorporated by reference below. The EA is available on the NPS Planning, Environment and Public Comment (PEPC) project site at <https://parkplanning.nps.gov/blcacuregrazing>.

The public was provided with multiple opportunities to comment during the planning process. The NPS held a 31-day public scoping period from August 19 to September 20, 2024, following initiation of the NEPA planning process. One virtual public scoping meeting was held on August 27, 2024, and two in-person meetings were held on August 28, 2024, and August 29, 2024, in Gunnison and Montrose, Colorado, respectively. In total, 14 people attended the public scoping meetings, including 3 on August 27, 4 on August 28, and 7 on August 29, 2024. The NPS received 14 unique pieces of correspondence during the public scoping period. The comments received were reviewed by the NPS and considered in developing the EA. A public scoping report documenting the process is available on the NPS PEPC project site at <https://parkplanning.nps.gov/blcacuregrazing>.

The NPS also requested public input on the EA during a 30-day EA public review period from May 28 to June 27, 2025. Three additional public meetings were held; two in-person meetings in Montrose, Colorado on June 3, 2025, and Gunnison, Colorado on June 4, 2025, and one virtual public meeting on June 5, 2025. In total, the NPS received 8 independent pieces of correspondence, several with substantive comments.

¹ Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and a Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The National Park Service verifies that it has complied with the requirements of NEPA, including the Department’s regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President’s January 2025 Order and Memorandum.

² The Department of the Interior (DOI) published an interim final rule, NEPA Implementing Regulations, on July 3, 2025, "rescinding and making necessary targeted updates to its remaining regulations implementing" NEPA. 90 Fed. Reg. 29498 (July 3, 2025). The park published a GrMP/EA on May 28, 2025, relying upon preexisting procedures that predate July 2, 2025. The GrMP NEPA review was sufficiently advanced at the time DOI issued the rule, so NPS will rely upon the preexisting procedures to issue this FONSI, completing the NEPA review for the GrMP. Nonetheless, the GrMP/EA is consistent with DOI's July 3, 2025, NEPA Implementing Regulations.

A summary of substantive public comments received and responses from the NPS is provided in Attachment A, Responses to Substantive Comments. Modifications to the text of the EA are provided in Attachment B, Errata.

1.2 SELECTED ALTERNATIVE AND RATIONALE FOR DECISION

1.2.1 Selected Alternative

The NPS analyzed three alternatives in detail in the EA including the no-action alternative. Based on this analysis, the NPS selected Alternative B, the Proposed Action, as the alternative for implementation because it best meets the purpose of, and need for, action, without causing significant or unacceptable impacts on park unit resources. The selected alternative is described in detail in Chapter 2 of the EA and is incorporated by reference here. As described in the EA, the selected alternative includes detailed programmatic actions that could be implemented in the GrMP and describes site-specific actions where possible. Impacts from the programmatic actions were broadly analyzed in the EA based on what was known or could be reasonably assumed at the time of preparation of the EA. Once the NPS completes targeted monitoring of grazing allotments, the specific location and scope of potential actions will become apparent. Once the scope and design are sufficiently developed for site-specific actions, additional project-level environmental and cultural review, analysis, and compliance would be completed as appropriate prior to implementation.

Under the selected alternative, NPS would utilize adaptive grazing management³ to guide authorization and administration of livestock grazing and trailing activities within the park units, consistent with NPS management policies (NPS 2006). NPS would issue SUPs for each allotment within NPS-administrative boundaries, on a schedule coordinated with the Bureau of Land Management (BLM) and US Forest Service (USFS) permit renewal process, including pre-season, interagency Annual Operations meetings with permittees. Permits for livestock grazing and trailing activities issued by NPS would include monitoring, mitigation measures, and grazing prescriptions to reduce impacts on natural and cultural resources and visitor experience.

The selected alternative will implement specific livestock management strategies for allotments and trailing routes that overlap with riparian areas, wet meadows, Gunnison sage-grouse (*Centrocercus minimus*, GUSG) habitat, bighorn sheep populations, rare and sensitive plant communities, recreational resources, and designated wilderness (refer to Appendix E in the EA for more information on details of the alternatives). These strategies will be based on adaptive management and adjusted based on both short- and long-term monitoring criteria and would consider annual drought forecasts, vegetation production, and other ecosystem conditions.

During annual pre-season meetings, NPS will renew or issue new SUPs for grazing in accordance with 36 CFR § 2.60 - Livestock use and agriculture. NPS-issued SUPs may adjust the timing, duration, and intensity of grazing activities, and implement other new or supplementary terms and conditions to meet resource objectives to be consistent with the goals for both park units. Resource objectives will be

³ Adaptive management is a system of management practices based on clearly identified outcomes and monitoring to determine whether management actions are meeting desired outcomes; and, if not, facilitating management changes that will best ensure that outcomes are met or re-evaluated. Adaptive management recognizes that knowledge about natural resource systems is sometimes uncertain (43 CFR 46.30). DOI provides a technical guide to coordinating adaptive management and NEPA processes, found here: <https://www.doi.gov/sites/doi.gov/files/uploads/esm13-11-adaptive-management-and-nepa-508.pdf>

informed by monitoring, and each SUP may have specific objectives for an allotment depending on ecological site conditions (refer to Appendix F in the EA for specific information regarding monitoring goals, objectives, and thresholds for adaptive management). Consistent with BLCA enabling legislation, allotments will expire upon the death of the permittee or voluntary relinquishment of a grazing permit. In CURE, after 5 consecutive years of non-use, park managers will consider retiring the allotment through a public process. Alternatively, grazing permits in CURE could be transferred or reissued at the superintendent's discretion. If BLM were to transfer or sublease a grazing permit to a new party on the BLM portion of a shared allotment, NPS could reissue a new SUP to the new party for the remaining duration of the BLM permit on the NPS portion of the shared allotment, at the discretion of the park superintendent.

Livestock Grazing and Trailing Management

NPS assumes that current permit holders will continue to graze livestock under currently authorized permits until changes to SUP terms and conditions are authorized by NPS. Under the selected alternative, NPS will develop SUPs that require permittees to meet—or make substantial progress towards meeting—desired conditions outlined within allotment-specific short- and long-term monitoring plans (refer to Appendix F in the EA for desired conditions indicators). NPS will require any livestock operators trailing across NPS lands to hold a valid SUP. The SUP will specify timing, duration of use, and number of livestock for the route. NPS assumes trailing routes would be similar to what is currently being used in the park units; however, adjustments to routes could be made if impacts on natural and cultural resources are identified. If a permittee proposes altering the location or increasing the level of use of a trailing route, NPS may require additional compliance.

Rangeland Infrastructure and Improvements

NPS will coordinate with permittees to prioritize the repair, modification, or removal of rangeland infrastructure within GUSG habitat, riparian areas, bighorn sheep habitat, wilderness, and where livestock grazing may conflict with recreation activities. Alterations to rangeland infrastructure will aim to promote ecosystem resilience and reduce ecological degradation, and to protect wilderness character where appropriate.

NPS will coordinate with permittees to modify water developments to wildlife friendly designs (i.e., closing water valves when livestock are not present or the addition of stock tank ladders) or to move water developments away from riparian zones into upland areas. This alternative will prioritize the repair of water developments that do not currently meet NPS standards (such as those that are not providing adequate water for livestock) and would allow for removal of water developments that are in disrepair and causing ecological degradation from flooding or livestock congregation.

The selected alternative will also prioritize fencing repairs or modification where fences are in disrepair or are not wildlife-friendly designs (refer to Section 3.2 in the EA, Wildlife and Special Status Species). While NPS would limit the construction of new fencing to the extent practicable, new fencing may be created to prevent livestock trespass or to improve habitat conditions for GUSG, riparian and wetland function, and recreation. This may include exclosures, riparian water gaps, creation of new pastures, or administrative boundary fencing. Any new infrastructure or improvements would require additional site-specific compliance.

Gunnison Sage-Grouse

Under the selected alternative, NPS will implement seasonal restrictions in grazing allotments containing GUSG habitat to manage and reduce disturbances from livestock grazing and trailing activities on GUSG

populations and their habitat during critical seasonal life cycle periods. This includes scheduled maintenance, administrative activities including resource surveys and monitoring, and other livestock distribution and management practices. NPS will defer the presence of livestock during lekking (March 15 to May 15),⁴ nesting (March 15 to May 15), and brooding seasons (May 15 to July 15) on allotments where there is overlap with these habitat types (CPW 2025a, Figure 3-2 and Figure 3-3 in the EA). Trailing that occurs through GUSG habitat on NPS lands will be confined to established linear routes (for example, two-track roads) from March 15 to July 15. Specific time and distance determinations for each allotment-specific SUP may be modified based on site-specific conditions and benchmarks measured during vegetation and soil monitoring. Time and distance determinations may also be modified through active monitoring of GUSG activity, in coordination with Colorado Parks and Wildlife (CPW) and the US Fish and Wildlife Service (USFWS).

Within grazing allotments, NPS will prioritize areas for GUSG habitat enhancement and connectivity and may alter the terms and conditions of SUPs to facilitate enhancement of habitat and ensure better treatment outcomes. Within livestock grazing allotments, vegetation treatments could occur in GUSG habitat to improve or maintain sites that have ecological site potential to support sagebrush habitat. NPS will prioritize the removal of cheatgrass (*Bromus tectorum*), spotted knapweed (*Centaurea stoebe*), and other invasive or non-native plant species from GUSG habitat. Vegetation removal will be accomplished through herbicide application as well as mechanical and manual removal. Vegetation restoration techniques to improve GUSG habitat include, but are not limited to, native plant seedings, live plantings, wet meadow and gully restoration, and long-term rest from livestock grazing with the use of drift fences or grazing exclosures to exclude livestock access to restoration areas. NPS will continue to rely on the best available science to determine where treatments would be most beneficial. Please refer to Appendix E in the EA for more information.

Under the selected alternative, NPS will inventory existing water developments to determine where incorporating best management practices (BMPs) for livestock distribution would enhance GUSG habitat. This could include modification, relocation, management, or removal of unneeded developments in GUSG habitat or naturally occurring riparian habitat. This could also include draining water from tanks when not in use to reduce predator attraction. Any temporary or permanent activities that disturb the soil surface will require additional compliance.

Bighorn Sheep

Under the selected alternative, NPS will remove domestic sheep grazing authorizations in bighorn sheep habitat on NPS-administered lands. Currently, there are 4 sheep grazing allotments which overlap bighorn sheep habitat, for a total of 4,033 acres (Table 2-1 in the EA). To prevent disease transmission to bighorn sheep, domestic sheep grazing on any allotments with bighorn sheep habitat, including instances where there is future bighorn sheep habitat expansion, will end when the current BLM grazing permit expires within CURE. Permittees would be given the option to shift their permitted livestock kind to cattle. If BLM or USFS make a management decision to prohibit domestic sheep grazing on an allotment with a shared boundary prior to the permit expiring, NPS will also end domestic sheep grazing on their portion of the allotment. Domestic sheep grazing within BLCA will end with the life of the current grazing

⁴ A lek is a traditional location where at least two male sage-grouse congregate during at least two springs within a 10-year period to perform their strutting display and opportunistically breed with females. Although males are territorial on leks and occupy an area, not a point, the representative location for the lek is the estimated or calculated center of the display activity. The “lek” is the standard reporting and analysis unit for evaluating population status and long-term trends (Cook et al. 2022).

permittee or if the grazing permit is voluntarily relinquished.

Riparian and Wetlands

Under the selected alternative, NPS will address the protection of soils, riparian-wetland areas, native plant communities, special status species, and water quality within livestock grazing allotments. To reduce impacts on these resources, NPS will conduct monitoring of standards, guidelines and thresholds outlined in allotment-specific monitoring plans and SUPs. Thresholds will include monitoring of annual production, riparian condition, and long-term soil and vegetation trends, among others (refer to Appendix F in the EA for more information). NPS will prioritize management techniques to prevent livestock from entering riparian-wetland areas, including, but not limited to riparian fencing, including total exclusion and water gaps; creation of upland water developments to draw livestock away from riparian areas; requirements in SUPs to establish range-riding activities to prevent concentration of livestock in riparian areas; and the use of salt and mineral supplements in upland environments through park superintendent approval outlined in permit terms and conditions (refer to Appendix E in the EA).

Through monitoring and adaptive management alterations to grazing season of use, duration, intensity, and distribution within allotments, NPS will aim to sustain proper functioning condition in riparian areas and prevent accelerated erosion of riparian soils. Where livestock grazing is not allowing riparian areas to sustain proper functioning condition, NPS will incorporate appropriate livestock management guidelines into livestock grazing permits based on ecological site potential. Refer to Appendix F in the EA for a full discussion of desired conditions.

NPS will prioritize restoration and protections of wet meadows and riparian areas using low-tech, process-based restoration techniques. NPS will place higher priority on sites with erosional features that cause lowered water tables and proneness to drought and soil aridification. Refer to Appendix E in the EA for more information.

NPS will inventory existing water developments to determine where incorporating Best Management Practices (BMPs) for livestock distribution would enhance riparian and wetland protection and restoration. This could include modification, relocation, management of, or removal of unneeded developments in naturally occurring riparian or wetland habitat.

Monitoring

Under the selected alternative, NPS will implement a formal programmatic monitoring and adaptive management program that includes both short- and long-term monitoring protocols (refer to Appendix F in the EA). The Programmatic Monitoring Plan provides desired conditions, objectives, or thresholds regarding resources that are present within each grazing allotment and provides NPS with a variety of monitoring methods to measure these thresholds. Thresholds and objectives will be outlined within individual SUP terms and conditions.

Monitoring and evaluation of livestock grazing will be used to determine if range conditions are being maintained at—or are moving away from—desired conditions due to livestock grazing. Monitoring data will be used to adjust grazing management strategies and livestock use, as appropriate. NPS may alter the distribution, timing, duration, and intensity of livestock grazing, as well as stocking rate, if monitoring data indicate livestock grazing is not meeting thresholds. Adjustments to timing and duration of grazing could include changes to on-and-off-dates or pasture rotations. Likewise, trailing routes could be altered in response to forage and range conditions or impacts on other park resources. NPS will implement annual monitoring of grazing allotments to document trends in rangeland attributes. Annual monitoring

may involve a combination of on-the-ground methods or other means consistent with the monitoring and adaptive management program (refer to Appendix F in the EA) as NPS determines is appropriate. Site-specific monitoring would inform grazing management for respective areas, typically within 3-5 years after the initiation of monitoring of a given allotment.

1.2.2 Rationale

The selected alternative best meets the purpose and need for the action because it provides the most effective and feasible long-term plan to ensure that livestock grazing is consistent with relevant laws, regulations, interagency agreements, and policies. Under the selected alternative, NPS will fulfill its commitment to preserve and protect the natural, cultural, and recreational resources as stated in the purpose of each park unit. The selected alternative also meets Section 4.4.2.3 of NPS *Management Policies 2006* which requires the NPS to “. . .protect and strive to recover all species native to national park system units that are listed under the Endangered Species Act”. Additionally, the National Park Service considered impacts on the Black Canyon of the Gunnison Wilderness. The impacts on this wilderness area are discussed in Section 1.4 “Significance Criteria Review.” While some actions result in small adverse impacts, most impacts of the selected alternative are beneficial to wilderness character over the long term. Therefore, the selected alternative will not impair the designated area’s future use and enjoyment as wilderness (see 16 USC 1131[a]).

While Alternative C best enhances NPS resources by phasing out grazing in CURE, it does not provide for the permitting of grazing, which would be inconsistent with the current NPS/US Bureau of Reclamation (USBR) interagency agreement (NPS 1965). Thus, NPS selected Alternative B because it both protects park resources and permits grazing consistent with relevant law, and in compliance with the interagency agreements applicable at CURE and BLCA.

The NPS considered other potential alternatives but dismissed them from further analysis as described in Chapter 2 of the EA and amended in Attachment B, Errata.

1.2.3 Changes to the Selected Alternative

The NPS added clarifications to some elements of the selected alternative and made substantive changes to the Programmatic Monitoring Plan in Appendix F of the EA as described below. All changes to the EA including minor edits and clarifications are included in Attachment B, Errata.

The Programmatic Monitoring Plan in the selected alternative has been modified in the following ways:

1. Reduced and clarified discretionary language such that “will” is used regarding a threshold triggering an action but “may” or “could” are used regarding what the specific action might entail (i.e. altering time, duration, intensity, and distribution of livestock);
2. Clarified that the Superintendent has the authority to adjust SUP terms and conditions at any point via written notice to permittees if negative impacts from livestock grazing to resources are apparent, in response to unexpected conditions (i.e. drought, wildland fire), or to ensure beneficial land treatment outcomes (i.e. invasive species treatments, seeding, or other restoration activities);
3. Clarified specific indicators and thresholds that would trigger adaptive management in uplands, riparian areas, and GUSG habitat;
4. Further clarified adaptive management thresholds that would trigger an action;
5. Established a stubble height metric as a threshold that would trigger an action in GUSG habitat;

6. Established a utilization threshold of 35% in GUSG habitat;
7. Clarified that under most circumstances, a 25-35% utilization threshold will be used to calculate appropriate stocking rates; and
8. Included specific examples of when the parks might change a specific attribute of the grazing system (i.e. time, duration, intensity, distribution) in relation to observed conditions

1.3 MITIGATION MEASURES

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the NPS will implement multiple mitigation measures and best management practices to protect wildlife/threatened and endangered species, vegetation, soils, wilderness, and water resources. These measures and practices are described in detail in Appendix D of the EA and are hereby incorporated by reference. As stated in the EA, these mitigation measures and best management practices are included as integral parts of the selected alternative. The NPS has the authority to implement the mitigation measures under the Organic Act of 1916 (54 USC 100101 et seq), the Wilderness Act of 1964 (16 USC 1131 et seq), the National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq), the Endangered Species Act, as amended (16 USC 1531 et seq), NPS *Management Policies 2006*, and other federal and state applicable requirements.

1.4 SIGNIFICANCE CRITERIA REVIEW

1.4.1 Potentially Affected Environment

The project area encompasses the entirety of the park units, located in southwestern Colorado between Gunnison and Montrose. Excluding Blue Mesa Reservoir, the park units have a total surface area of 62,880 acres, of which approximately 28 percent (17,480 acres) are grazing allotments. Of the 72,550 total acres (including Blue Mesa Reservoir), 31,250 acres are within BLCA and 41,300 acres within CURE. The Black Canyon of the Gunnison Wilderness in the northwest corner of the project area is approximately 15,600 acres and overlaps with 1 allotment in BLCA. This FONSI only applies to impacts on NPS-administered lands within both park units.

To evaluate the potential for significant impacts, agencies consider the setting, or potentially affected environment in which impacts may occur. In this case, the selected alternative may beneficially or adversely impact wildlife and special status species such as threatened and endangered species, vegetation, soils, livestock grazing, water resources, socioeconomics, and designated wilderness. Wilderness and threatened and endangered species are resources that are afforded different levels of protection through the Wilderness Act and the Endangered Species Act.

The primary threatened and endangered species in the project area include Canada lynx, Gray wolf, Gunnison sage-grouse, Mexican spotted owl, and the Yellow-billed cuckoo. General wildlife of note includes bighorn sheep, which can be impacted by disease transmission from domestic sheep that graze in and around the project area.

Vegetation in the project area ranges from upland vegetation such as pine, juniper, and sagebrush to riparian vegetation types along the Gunnison River, the reservoirs, and tributaries that feed into the river and reservoirs. The soils within the park units range from sandy loam to clay loam type soils that are very deep. Soil texture consists primarily of variations of loam and sand, and gravelly soils occur on slopes and mountains. Soil erosion and compaction can be impacted by livestock grazing and trailing practices.

The Black Canyon of the Gunnison Wilderness is approximately 15,600 acres and there is one grazing allotment within Black Canyon of the Gunnison Wilderness. The Green Mountain grazing allotment (2,199 acres) overlaps the wilderness by approximately 1,934 acres. Livestock grazing operations can adversely affect wilderness due to the presence of grazing infrastructure including stock ponds, fences, and two-track roads.

Socioeconomics and the grazing operations themselves can also be affected by how agencies review and approve individual grazing and trailing permits.

Water resources in the project area include the Gunnison River, its tributaries, and the three reservoirs created by the impoundment of the Gunnison River, a major tributary of the Colorado River. Livestock grazing and trailing activities have the potential to negatively affect water resources from contaminants such as E. coli and the physical degradation of riparian habitats.

Please refer to section 1.4.2 for a more detailed description of the potential effects of the selected alternative on each of the resources discussed in the potentially affected environment.

1.4.2 Degree of Effects of the Action

The NPS considered the following actual or potential project effects in evaluating the degree of effects for the selected alternative.

Beneficial and Adverse, and Short-term and Long-term Effects of the Selected alternative

No significant impacts to resources were identified in the EA that would require analysis in an Environmental Impact Statement (EIS). Whether considered individually or as a whole, the impacts of the selected alternative, including direct and indirect, do not reach the level of a significant effect because most adverse impacts associated with implementation will be minimal or temporary, lasting only as long as actions are being executed. The selected alternative will result in substantial long-term beneficial impacts to wildlife and special status species and the natural quality of wilderness. Best management practices and mitigation measures as mentioned above (and described in detail in Appendix D of the EA) will further minimize any potential adverse impacts.

Wildlife and Special Status Species

As discussed in Chapter 3 of the EA, the selected alternative will result in livestock grazing that could impact wildlife and special status species within the project area. Grazing impacts will be mitigated through the implementation of allotment-specific SUPs, monitoring, and use of best management practices and mitigation measures.

Under the selected alternative, NPS would issue SUPs that will require permittees to meet or make progress towards meeting desired conditions outlined within allotment-specific short- and long-term monitoring plans. Short-term impacts on general wildlife and special status species would be similar to existing conditions; however, the selected alternative would result in greater beneficial impacts on general wildlife and special status species over the long term. For example, while grazing would still continue under the selected alternative and therefore may disturb general wildlife and special status species habitats in the short term, the refinement and application of seasonal habitat restrictions, such as not allowing grazing activities in GUSG brooding areas through July 15th and restricting trailing in GUSG habitat to established linear routes through July 15th would reduce disturbances in the long term (e.g., localized trampling, early season herbivory of native perennial grasses) during sensitive life history periods, such as lekking, brooding, and breeding (March 15 through July 15), for GUSG compared to existing conditions.

These monitoring-informed requirements reduce potential impacts from the selected alternative and ensure that the impacts to wildlife and special status species are not significant.

NPS will alter terms and conditions in allotment-specific SUPs to better conserve GUSG habitat, including adjusting season of use, intensity, and duration of grazing, if monitoring indicated habitat degradation. NPS will also terminate grazing SUPs where there has been documented and repeated noncompliance with SUP terms and conditions. These actions would help to reduce disturbance to GUSG from the presence of livestock during sensitive brood-rearing times on approximately 1,460 acres of brood areas that overlap with project area allotments (refer to Table 3-6 in the EA). Additionally, habitat enhancement and targeted vegetation treatments such as removal of non-native plant species in allotments containing GUSG habitat (occupied and unoccupied, refer to Figure 3-1 in the EA) could be implemented to support and maintain sagebrush habitats in the late summer and early fall so as to not interfere with lekking, breeding, and brooding season, which would increase both the quality and quantity of GUSG habitat compared to baseline conditions under which areas for habitat enhancement and connectivity would not be prioritized. These actions could help slow or reverse the decline in native perennial grasses observed in BLCA and CURE sagebrush shrublands over the last decade (Livensperger 2025). Collectively, these actions would also improve the condition of habitat for general wildlife and the five primary constituent elements of approximately 10,230 acres of GUSG critical habitat in BLCA and CURE grazing allotments, thereby ensuring that impacts to GUSG habitat from permitted grazing activities would remain less than significant.

Habitat restrictions under the selected alternative would reduce the risk of harm and mortality of bighorn sheep via the limitation of domestic sheep grazing based on WAFWA guidelines. Domestic sheep grazing will be removed on allotments on NPS lands where it overlaps with existing bighorn sheep habitat. Removing domestic sheep would substantially reduce the chances of conflicts among domestic sheep and bighorn sheep, such as disease transmission.

As described in the EA, it is reasonable to expect gray wolves will be present in or near the project area in the coming years as they have been reintroduced to the state as an experimental, non-essential population. CPW manages wolves in Colorado pursuant to a Section 10(j) rule under the Endangered Species Act, which allows some management flexibility to protect human safety and reduce livestock depredation. As such, livestock operators may utilize deterrent or hazing activities to protect humans and livestock. When nonlethal management actions are ineffective and may not resolve conflict, lethal take/depredation activities may be used to stop active conflicts (subject to federal guidelines), thus leading to potential impacts to gray wolves. The NPS anticipates that wolves will follow big game to higher elevations (outside the parks) along established migration routes in early spring (Wehr et al. 2024). This, combined with known turn-out dates in late May and the lower elevations in which grazing occurs in the park units leads the NPS to believe that conflicts among livestock operators and wolves will be less likely to occur in the park units when compared to other areas. Because these effects would be limited in extent across the project area, effects on gray wolves are expected to be discountable and not significant.

Under the selected alternative, potential impacts to general wildlife, and special status species, including federally listed species and critical habitat, could occur through ongoing livestock grazing, rangeland infrastructure activities, and trailing. The implementation of allotment-specific SUPs including management for GUSG, bighorn sheep, riparian and wetland habitats, and monitoring would provide long term benefits to all wildlife, including special status species, and their associated habitats. Monitoring and evaluation of livestock use, rangeland vegetation, and soils will be used to determine if rangelands and

riparian areas are being maintained at desired conditions and the degree to which livestock use is driving observed responses. This allows the NPS to alter the distribution, timing, duration, and intensity of livestock grazing to prevent habitat degradation eliminating the potential for significant impacts to occur. NPS will utilize best management practices and mitigation measures to minimize, avoid, or eliminate impacts to general and special status wildlife species and their habitats. Implementation of mitigation measures specified in Appendix D of the EA would limit the potential impacts to wildlife and special status species, including federally-listed species and designated critical habitat, during the implementation of the selected alternative. In their August 8, 2025 correspondence, the USFWS concurred with the NPS that the selected alternative is not likely adversely affect federally listed species or designated critical habitats. Additionally, as grazing eventually ends in BLCA, impacts from grazing on wildlife and special status species would be eliminated. With implementation of mitigation measures, the impacts to wildlife and special status species, including federally-listed species and designated critical habitat are expected to be negligible and therefore not significant.

Vegetation

Under the selected alternative, short-term impacts on vegetation from livestock grazing and trailing would be similar to existing conditions; however, the selected alternative would result in greater beneficial impacts on vegetation over the long term. The selected alternative will provide for earlier detection of impacts on vegetation, track progress toward desired conditions, and include design elements that overall reduce the impacts of livestock grazing on vegetation.

The selected alternative will result in some continued long-term adverse impacts to vegetation. Livestock grazing and trailing would continue to cause impacts resulting from localized trampling and removal of vegetation. Direct impacts on native vegetation include the damage or removal of individual plants, which could influence the prevalence of different species and overall composition of vegetation communities. There could also be an increased potential for the introduction of invasive plant species. These impacts would only occur during grazing and trailing to and from grazing allotments and are influenced by the duration, timing, and intensity of grazing. However, the implementation of a short- and long-term monitoring plan would allow for earlier detection of impacts on vegetation and movement away from desired conditions within the allotments and along trailing routes. Ongoing monitoring, evaluation, and potential adjustments to livestock grazing (e.g., timing, duration, intensity) would result in a long-term benefit to vegetation and eliminate the potential for significant impacts.

NPS will use allotment-specific monitoring data and references such as Natural Resource Conservation Service ecological site descriptions and reference sheets to track progress towards desired conditions. Tracking vegetation change through time will allow the park units to adjust permit terms and conditions as necessary to meet or make progress toward achieving desired conditions, which would benefit vegetation communities through time. In the long term, livestock grazing would not hinder vegetation communities from having a diverse native plant species composition, a healthy functional age-class group structure, a viable seed bank for regeneration of native plant species after a disturbance event, and minimal presence of increasing undesirable species

Grazing in BLCA would continue for the lifetime of the permit holder, or until the permittee voluntarily relinquishes their permit. Permits for Vernal Mesa, East Portal, and Red Rock Canyon would expire in 2027 due to the discontinuation of deeded rights. Therefore, impacts on vegetation from livestock grazing would be eliminated after grazing is removed in these allotments.

Under the selected alternative, vegetation treatments that are designed for GUSG habitat enhancement

and connectivity would improve or maintain vegetation communities in GUSG habitat over the long term. These treatments will mainly be implemented in areas that have the potential to support sagebrush habitat. Therefore, sagebrush vegetation communities would receive the greatest benefit from these types of habitat enhancement treatments.

While the presence of livestock grazing and trailing will continue to have adverse impacts on vegetation, those impacts would be reduced over time as the NPS increases monitoring and uses adaptive management to adjust permit terms and conditions to improve the condition of vegetation within allotments. That combined with the eventual cessation of grazing in BLCA would ensure that impacts to vegetation in the project area are not significant.

Soils

Impacts on soils from livestock use would continue under the selected alternative, which could result in soil compaction and displacement, increasing the potential for soil erosion. However, over the long term, the selected alternative would improve soil stability and quality within the areas of the park units subject to grazing and trailing activities. NPS grazing SUP terms and conditions will contain specific short- and long-term management actions that would reduce disturbance from livestock grazing and management on soil resources, including biological soil crusts, should monitoring indicate departures from desired conditions. Short-term management actions include, but are not limited to, changes in duration, timing, distribution, and season of livestock use. Long-term management actions implemented include, but are not limited to, range improvements and modifications in stocking rates if necessary. These changes to NPS grazing SUPs could improve soil stability and help eliminate the potential for significant impacts on soils, including biological soil crusts, from livestock grazing on all grazing allotments within the park units.

Livestock trailing would continue under the selected alternative. Soil impacts from livestock trailing activities can include localized (i.e., along the trailing route) soil and organic matter displacement and pedestalling that occurs when plants and rocks are higher than the soil surface due to soil compaction when soils are moist (such as in riparian areas). Livestock trailing can also disturb biological soil crusts, which could decrease the abundance of biological communities and reduce the crust's function to provide soil stability. These effects would indirectly increase the potential for soil erosion. Under the selected alternative, NPS may alter existing livestock trailing routes to reduce impacts on affected resources, including soils. Livestock trailing can also disturb biological soil crusts, which could decrease the abundance of biological communities and reduce the crust's function to provide soil stability. These effects would indirectly increase the potential for soil erosion. The time it takes for organisms to recover would depend on the biological composition of the crust; cyanobacteria recover faster than moss and lichen after physical disturbance (Belnap et al. 2001) However, in areas previously not used for livestock trailing, livestock trailing may be authorized in order to mitigate impacts on a critical resource that may be present within current authorized trailing routes (i.e. ESA plant presence or cultural resource site). The soil quality and stability would be reduced if livestock trailing is authorized in these areas under the selected alternative. These soils impacts would be limited to the extent of the livestock trailing route and would be subject to the terms and conditions of the grazing/trailing SUP, which the NPS would use to ensure that impacts to soils would not be significant.

NPS will maintain, modify, or implement new range improvements as determined through analysis of compiled monitoring data under the selected alternative. Soils would be disturbed and impacted temporarily during the construction of new range improvements under the selected alternative. These

impacts would be short term and limited to the construction area only, and would therefore not be significant.

Because the selected alternative includes the implementation of a programmatic monitoring plan and will allow the NPS to adjust the SUP terms and conditions to protect soils, the selected alternative will not result in significant impacts. Additionally, as grazing eventually ends in BLCA, impacts from grazing on soils would be eliminated in that park unit.

Wilderness

As discussed in chapter 3 of the EA, the untrammled quality of wilderness would continue to degrade because of continued grazing practices, invasive species management actions, and unauthorized motor vehicle use. The removal of any existing human-made installations would also be considered a temporary trammeling action; however, the area in which installations are removed would be restored over time, improving the untrammled quality in those areas.

As on-the-ground monitoring increases under the GrMP, the use of motor vehicles in wilderness under the selected alternative will be subject to increased scrutiny by the NPS. The use of motor vehicles would likely decrease, improving wilderness character as the intrusion and scarring of user-created roads would be decreased. Under the selected alternative, NPS will reissue the existing grazing permit to the Green Mountain permittee with specific stipulations regarding the authorized use of motorized vehicles in wilderness. Motorized vehicle use may be permitted as defined in allotment-specific SUPs. Examples of need for motorized vehicles include the removal of sick or dead livestock and the removal of abandoned installations. A minimum requirements analysis (MRA) will be prepared to permit motorized vehicle use for these needs, as general vehicle use in wilderness is prohibited. Therefore, the improved management of motorized vehicles under the selected alternative would reduce the intrusion of user-created trails and improve the untrammled quality of Black Canyon of the Gunnison Wilderness.

Invasive species may be introduced to the wilderness because of continued livestock grazing under the selected alternative. The subsequent invasive species control actions would be implemented in accordance with the 2023 Wilderness and Backcountry Management Plan for the park and would benefit native vegetation and wildlife and could improve range conditions and the natural quality of wilderness.

Under the selected alternative, human-made installations will be removed from wilderness where appropriate. The removal of human-made installations would improve natural quality, as those areas would revegetate naturally over time. Additionally, the implementation of low-impact livestock management techniques would also improve the natural quality by reducing the permanent installations necessary to manage cattle. Over time, the natural quality of the wilderness would be improved compared to baseline conditions.

During the SUP renewal process, the NPS will also review any new or existing grazing installations in wilderness to ensure that they are required to support the grazing operation and that the scope and scale of the installation is the minimum necessary. New range installations or the restoration of existing installations may be authorized by NPS through the MRA process if the action is determined to be the minimum necessary requirement to manage the area. Any new installations authorized in wilderness would detract from wilderness character, including the undeveloped quality. At this time, the NPS does not anticipate the need for any new installations related to livestock management in wilderness. The decreased use of motorized vehicles in wilderness would improve the undeveloped quality by reducing noise levels, user-created trails, and the visual appearance of human-made equipment.

With increased monitoring under the programmatic monitoring plan and increased NPS scrutiny of uses and installations in wilderness during the grazing SUP renewal process, conditions in the wilderness area should improve over the long term. As grazing eventually ends in BLCA, the wilderness character in the project area should improve substantially over the long term. Therefore, impacts to wilderness resources would not be significant.

Socioeconomics and Economic Effects

The selected alternative will not result in direct changes to the overall level of maximum allowable AUMs (animal unit month) on joint NPS/BLM allotments; therefore, the level of associated economic contributions would remain consistent (although it could vary with market conditions). Under the selected alternative, there would be additional costs to permittees associated with NPS SUPs (current SUP fee of \$109, adjusted based on actual costs and administrative fees). BLM would no longer collect grazing fees for NPS-administered lands; fees would be collected by NPS at the same rate as BLM, set at \$1.35 per AUM for fiscal year 2025.

While there would be no direct changes to overall maximum preference of AUMs, components of the selected alternative such as new SUP terms and conditions (e.g. those resulting in the need for range riders and range improvement construction or maintenance), range monitoring implementation, and bighorn sheep management could result in impacts on livestock grazing permittees and changes to AUMs. However, these indirect changes to the overall permitted level of AUMs cannot be quantified.

Adoption of the selected alternative will establish desired conditions, objectives, or thresholds regarding resources that are present within each grazing allotment by ecological site and provide NPS with a variety of monitoring methods to measure these thresholds. Thresholds and objectives will be outlined within individual SUP terms and conditions. Depending on whether range conditions are being maintained or moving away from desired conditions as a result of livestock grazing, NPS, in consultation with permittees, could alter the distribution, timing, duration, and intensity of grazing, as well as stocking rate, to maintain desired conditions or prevent further degradation of resources, including rest of pastures. Management actions implemented to respond to monitoring data indicating range conditions are moving away from desired conditions or natural disturbance (e.g., fire, drought and soil aridification) could reduce stocking rates and alter grazing schedules, thereby impacting the economic contributions associated with livestock grazing and the costs associated with grazing for permittees. For allotments split between NPS and BLM land management, BLM and NPS allotments will be operated as two discrete allotments and the permitted AUMs can be adjusted for each if determined appropriate based on monitoring data.

Under the selected alternative, NPS will defer the presence of livestock during GUSG brooding seasons on allotments where there is overlap with those areas (CPW 2025a, Figure 3-2 and Figure 3-3 in the EA). This could result in additional time and costs for permittees operating in these allotments, due to the need to find alternative forage and potentially alter trailing and pasture rotation schedules.

Additionally, under the selected alternative, the creation of fences and barriers would make specific areas within grazing allotments not accessible for livestock. Costs associated with closing allotments would likely be shared among BLM, USFS, NPS and the permittee. In addition, the need for fences or barriers could result in increased time or cost for livestock grazing permittees. Spending on fences and barrier material and construction could represent economic contributions to the area, the exact amount would depend on the miles of fencing, costs of materials, and the percent of local spending.

NPS will remove domestic sheep grazing authorizations in allotments with bighorn sheep habitat on NPS-administered lands. Under the selected alternative, management which results in the need to change the kind of livestock (i.e., restrictions on domestic sheep for bighorn sheep management) could result in increased costs for permittees. There are 4 allotments where domestic sheep grazing occurs in CURE. Therefore, impacts on permittees could occur for those allotments. Impacts would occur at the time when current grazing permits expire. In addition, if BLM or USFS make a management decision to prohibit domestic sheep grazing on an allotment with a shared boundary, NPS would also end domestic sheep grazing on their portion of the allotment, therefore impacts could occur at this time. If a livestock grazing operator chooses to no longer operate, due to the costs associated with changing operations, this would result in impacts on associated economic contributions.

Protection of riparian areas under the selected alternative could reduce the acreage and forage available for livestock grazing through the implementation of protective management measures. This could impact livestock grazing operations by reducing the number of AUMs permitted within SUPs.

Various elements of the selected alternative could result in increased costs to individual grazing permittees but should not be at the amount that they would be prohibitive to the ongoing grazing operations in the project area. Visitation to both park units should be largely unaffected by the implementation of the selected alternative and impacts on recreational experiences from livestock should decrease under the selected alternative, allowing tourism to the area to continue at current trends. Therefore, no significant impacts to the economy would occur under the selected alternative.

Livestock Grazing

Under the selected alternative, NPS will issue new or reissue SUPs with terms and conditions that would be tailored to meet specific purposes, goals, and objectives of the park units. The selected alternative will implement a programmatic monitoring plan to inform and guide NPS livestock grazing management and terms and conditions in SUPs. If monitoring data indicate an allotment is not meeting or making significant progress towards meeting desired conditions as a result of livestock grazing, future grazing SUPs may alter livestock grazing time, duration, distribution, and intensity or reduce permitted AUMs on NPS portions of grazing allotments to meet specific goals and objectives outlined in Appendix D in the EA.

NPS will adopt Western Association of Fish and Wildlife Agencies (WAFWA) standards or management practices to reduce conflict between domestic sheep and bighorn sheep (WAFWA 2025). This action will affect four domestic sheep grazing authorizations where 4,033 acres (22 percent of grazing allotment acres) of domestic sheep grazing allotments overlap with bighorn sheep habitat. Domestic sheep grazing will be eliminated in these areas to mitigate conflicts between domestic and bighorn sheep. Domestic sheep grazing will be removed from up to 7,115 acres (40 percent) of grazing allotments under the selected alternative. The impacts from eliminating domestic sheep grazing on livestock grazing operations under the selected alternative would be greater than under existing conditions. However, domestic sheep permittees would have the opportunity to switch their livestock operations to cattle. There would be an increase in cost and labor associated with purchasing equipment and other supplies required for cattle grazing operations.

The selected alternative will allow NPS to either keep the same trailing routes through the park units, create new routes, or alter existing routes to protect natural and cultural resources. Changes to existing trailing routes, such as changes to timing, location, and distance, could be modified by NPS. If a new trailing route is not feasible, permittees may need to have livestock shipped by truck to be turned out onto

a grazing allotment adjacent to the park units, which represents an increase in cost and labor for grazing operations. Livestock trailing modifications could require extra time and effort from grazing permittees, such as more intensive stockmanship to keep livestock within trailing lanes and longer trailing routes to ensure livestock trailing activities have the least impact on natural and cultural resources.

No new trailing routes will be authorized through GUSG critical habitat and trailing buffers would be established within allotment SUPs. Livestock drift buffers will be removed from approximately 910 acres where designated GUSG habitat overlaps current livestock drift buffers. Livestock trailing routes may become longer or have smaller drift buffers to prevent livestock from entering any designated GUSG habitat when trailing through NPS-administrative boundaries.

Protection of riparian areas under the selected alternative could reduce grazeable acreage for livestock through the implementation of protective management measures such as fencing. Riparian protection actions could alter current livestock grazing schedules and rotations compared to existing conditions. As described above and in the EA, the implementation of the selected alternative allows for increased flexibility to determine appropriate actions on grazing allotments but could result in increased restriction of livestock grazing and trailing in the project area. However, the NPS will work with individual grazing permittees during the SUP issuance or renewal processes to ensure coherence with livestock operations while still meeting or making substantial progress towards desired conditions outlined within allotment-specific short- and long-term monitoring plans. While sheep grazing operations in mapped bighorn sheep habitat could be adversely affected under the selected alternative, those grazers could mitigate those effects by switching from sheep to cattle under their SUP. When considering the entirety of the various grazing operations in the project area, there should be no significant adverse impacts to livestock grazing under the selected alternative.

Water Resources

As stated in the EA, livestock can contribute directly to the degradation of riparian function and water quality in the park units through impacts from animal waste pollution and physical effects of trampling and removal of riparian vegetation. These impacts would continue to some extent under the selected alternative but would be reduced due to terms and conditions that would be incorporated under specific grazing SUPs. Under the selected alternative, water developments, bedding, resting, or other concentrated livestock use will no longer occur within riparian areas. NPS will manage allotments to maintain the proper functioning condition of riparian areas by installing fencing or otherwise restricting livestock access to riparian areas and wet meadows as necessary, particularly in allotments that contain larger acreages of riparian and wetland areas. Reducing livestock presence in riparian areas would directly benefit water quality by decreasing the volume of nutrients and pathogens that may enter the water via animal waste. These benefits would be concentrated in allotments that contain the largest acreage of riparian and wetland areas such as Iola (31.7 acres) and Sapinero Mesa (75.2 acres) which are both located in CURE (refer to Table 3-10 in the EA). Collaboration with permittees to target invasive plant species and prevent soil erosion would benefit riparian function (refer to Section 3.3 in the EA, Vegetation, for a full description of impacts on riparian communities). Prioritizing certain areas for restoration, such as erosional features that cause lowered water tables and proneness to drought and soil aridification, would further contribute to these benefits. Improvements in riparian function would in turn benefit water quality through various chemical and biological processes (Dosskey et al. 2010).

Overall, actions that will be implemented under the selected alternative would benefit riparian function and water quality when compared to existing conditions, particularly in allotments that contain the largest

acreage of riparian and wetland areas. Therefore, with the implementation of best management practices incorporated into grazing SUP terms and conditions, the selected alternative will result in an improvement to water resources and would not result in significant adverse impacts. Additionally, as grazing eventually ends in BLCA, impacts from grazing on water resources in that park unit would be eliminated.

Degree to Which the Selected Alternative Affects Public Health and Safety

The selected alternative considers public health and safety during project implementation. There are minimal interactions between livestock and visitors at the park units. Livestock usually stay at a distance from visitors. There have been some instances of livestock in campgrounds and day-use areas, but there have been minimal recorded impacts on health and safety. There also would be no expected visitor health and safety impacts during typical livestock operations. The selected alternative includes fencing measures to reduce the potential for livestock/visitor interactions.

Effects on the Quality of Life of the American People

Implementation of the selected alternative will not meaningfully affect the public's access to products produced from Federal lands. Although grazing will eventually end at BLCA according to park enabling legislation, livestock production will continue to occur over the long term on NPS-administered lands within CURE. While the EA noted some livestock conflicts with recreational use in CURE, the selected alternative contains measures to reduce or eliminate those conflicts by installing livestock fencing. Access to recreation in both park units will remain the same since grazing does not preclude or interfere with public access. The majority of recreational opportunities in the parks will be generally unaffected by the presence of grazing allotments. The selected alternative will not affect emergency services, public water supply, transportation, education, or social services. With respect to the way of life and culture for Native Americans, the NPS consulted with affiliated tribes who expressed no concerns with the implementation of the GrMP. The selected alternative will not affect the public's ability to passively use ecosystems on NPS lands as public access to park ecosystems are outside of grazing allotments. The selected alternative would not affect public education or interpretation at the parks, as grazing allotments would not interfere with interpretive opportunities which are generally located on designated trails and at visitor centers, which are not associated with the areas where grazing is permitted in the project area.

1.4.3 1.4.3 AGENCY COOPERATION AND CONSULTATION

Cooperating Agency Involvement

Cooperating agencies provide information, expertise, and review of working documents. NPS solicited cooperating agency involvement from the following five agencies; US Forest Service, Bureau of Land Management, Colorado Parks and Wildlife, US Fish and Wildlife Service, and US Bureau of Reclamation.

The following four agencies signed a memorandum of understanding with NPS to become cooperating agencies for this GrMP/EA; US Forest Service, Bureau of Land Management, Colorado Parks and Wildlife, and US Fish and Wildlife Service.

Agency and Tribal Consultation

Section 7 of the ESA requires federal agencies to ensure that the actions they authorize, fund, or carry out do not jeopardize the continued existence of listed species or destroy or adversely modify critical habitat.

Based on the analysis provided in Chapter 3 of the EA, activities authorized under the selected alternative *may affect, but are not likely to adversely affect* all analyzed federally listed plant species and

their designated critical habitat, as applicable. Based on the analysis provided in Chapter 3 of the EA, implementation of the selected alternative *may affect, but are not likely to adversely affect* all analyzed federally listed wildlife species and their designated critical habitat, as applicable. **Table 1** provides ESA Section 7 determinations for listed wildlife species under the selected alternative.

TABLE 1: THREATENED AND ENDANGERED WILDLIFE SECTION 7 DETERMINATIONS

Scientific Name	Common Name	Selected alternative Sec. 7 Determination
<i>Lynx canadensis</i>	Canada lynx	<i>No effect</i>
<i>Canis lupus</i>	Gray wolf	<i>May affect, not likely to adversely affect</i>
<i>Centrocercus minimus</i>	Gunnison sage-grouse	<i>May affect, not likely to adversely affect</i>
—	Gunnison sage-grouse critical habitat	<i>May affect, not likely to adversely affect</i>
<i>Strix occidentalis lucida</i>	Mexican spotted owl	<i>No effect</i>
<i>Coccyzus americanus</i>	Yellow-billed cuckoo	<i>No effect</i>
<i>Danaus plexippus</i>	Monarch butterfly	<i>May affect, not likely to adversely affect</i>
<i>Bombus suckleyi</i>	Suckley’s cuckoo bumble bee	<i>May affect, not likely to adversely affect</i>

NPS coordinated with the USFWS Western Ecological Services Field Office to ensure compliance with Section 7 of the ESA. The NPS sent the internal draft EA to all cooperating agencies including USFWS on April 2, 2025. The USFWS reviewed the internal draft EA and a meeting with the NPS was held on April 22, 2025 to discuss potential impacts to threatened and endangered species. The NPS and USFWS held follow-up calls regarding ESA compliance on May 7 and July 2, 2025. The EA served as a Biological Assessment with Section 7 determinations provided for federally listed plant and wildlife species. On August 8, 2025, the NPS received a memo from the USFWS (Attachment D) stating that they concur with the NPS’s determination that the selected alternative *may affect, but is not likely to adversely affect* federally listed species or designated critical habitats.

Compliance with Section 106 of the National Historic Preservation Act was conducted in consultation with the Colorado State Historic Preservation Office (SHPO) and federally recognized tribes concurrently during the NEPA planning process. The Agency Official for Section 106 (BLCA/CURE Superintendent), as stipulated in 36 CFR 800.2(a), determined that this EA is defined as “nondestructive project planning,” as stipulated in 36 CFR 800.1(c), because the actions of the EA do not restrict the subsequent consideration of alternatives to avoid, minimize, or mitigate any adverse effects that might result from the implementation of undertakings, as defined in 36 CFR 800.16(y), associated with the EA. After consultation with the Colorado SHPO, the park will execute a Programmatic Agreement, as stipulated in 36 CFR Part 800.14(b), to govern how Section 106 compliance will be completed for the undertakings initiated or developed from the EA.

The three federally-recognized Ute Tribes, the Absentee-Shawnee, the Navajo Nation, Jemez Pueblo, and the White Mountain Community (Ute Mountain Ute) were notified of the Grazing Management Plan development in January 2025. The parks received one request for additional information from the Southern Ute, which was responded to. The parks have received no comments from the consulting Tribes.

1.5 FINDING OF NO SIGNIFICANT IMPACT

Based on the information contained in the EA and described above, the NPS has determined that the

selected alternative does not constitute a major federal action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). Therefore, an EIS will not be required.

This finding is based on consideration of the Council on Environmental Quality and NPS guidance, in place at the time NPS initiated NEPA review, on the criteria for significance, regarding the potentially affected environment and degrees of effects of the impacts described in the EA (which is hereby incorporated by reference) and as summarized above.

ATTACHMENT A: RESPONSES TO SUBSTANTIVE PUBLIC COMMENTS ON ENVIRONMENTAL ASSESSMENT

CONCERN 1: The NPS should not manage according to the BLM's Multiple-Use Framework, as it does not comply with NPS Policy 4.4.1, General Principles for Managing Biological Resources. NPS's management and protection of natural resources within the park units should exceed BLM and Forest Service management practices.

Response: The National Park Service (NPS) manages according to its own laws and policies, as well as the specific enabling authorities of each park, rather than the policies of the Bureau of Land Management (BLM). Although both BLCA and CURE had ongoing grazing when the NPS began managing them, they are governed by different authorities.

For Black Canyon, Congress mandated that the NPS transition from grazing to no grazing within the park, aligning with the action alternatives evaluated in the Environmental Assessment (EA) and NPS Management Policies. Curecanti NRA is governed by the Colorado River Storage Project Act, Section 8, as outlined in the 1965 Memorandum of Agreement (MOA) between the United States Bureau of Reclamation (USBR) and the NPS (NPS 1965). This MOA assigns the NPS responsibility for resource protection, visitor enjoyment, and reservoir-based recreation opportunities, and also includes provisions for grazing management.

Pursuant to the 1965 MOA, the NPS manages grazing in coordination with the BLM. The action alternatives all bring NPS into alignment with NPS policies and laws by adhering to legislative directives, interagency agreements, and general management policy, rather than BLM's multiple-use framework.

CONCERN 2: NPS does not have an adequate budget or staffing capacities to monitor and manage livestock grazing within the park units outlined in Alternative B.

Response: There are always inherent uncertainties regarding the federal budget and what is allocated to the NPS and the parks. The parks understand the necessity of monitoring and are committed to ensuring data are collected in a manner and timeframe that allows for adaptive management. Additionally, the combination of on-the-ground and remotely sensed data that will be used for monitoring alleviates some potential future constraints. As grazing in BLCA phases out over time, the costs and effort required to implement the project will eventually decline, making it easier on the parks to shift resources to active allotments and ensure that monitoring and adaptive management actions are successful.

CONCERN 3: Alternative B does not specify how adaptive management would be implemented and does not outline the representative desired conditions and thresholds that will be managed towards meeting NPS Policy 4.4.1. The proposed adaptive management framework lacks the specific thresholds, trigger points, and enforceable management responses needed to prioritize the protection of park unit resources. Likewise, NPS should clearly state what the standards, guidelines, and thresholds are for specific monitoring plans in the EA and how they would be implemented over time.

Response: The specific details regarding the desired conditions and thresholds are outlined in Appendix F: Programmatic Monitoring Plan, which has been amended through changes noted in Attachment B, Errata. The desired conditions are identified as Community Phase 1.1 of the ecological site as described in the associated Ecological Site Description (ESD) and reference sheet. Specific indicators include percent bare ground cover, percent litter cover, soil stability, functional/structural group composition (relative dominance, functional/structural group presence and absence, and total combined number of species expected in dominant and subdominant functional/structural groups), Proper Functioning Condition (in riparian areas), and vegetation

height (in GUSG habitat). Due to the high number of ecological sites located in the parks and because monitoring points have not yet been identified, it was not practical to list the specific metrics for every possible ecological site. Ecological Site Descriptions can be viewed at: <https://edit.jornada.nmsu.edu/catalogs/esd>.

Adaptive management would be triggered when monitoring indicates that the thresholds in Appendix F have been observed. The threshold for action was identified as 3 of the 4 indicators being departed by a specific percentage or in a specific way from desired conditions for 3 consecutive evaluation periods. Changes have been made to Appendix F of the EA to clarify these thresholds and triggers (refer to Attachment B, Errata). If a threshold is reached, changes would be made to the grazing system to address the identified issue. The specific action to be taken is not identified because there are a suite of options that could be utilized for a given resource concern (duration, timing, distribution, and/or intensity of grazing); however, one (or more) of the identified management actions would be taken if the specific threshold has been crossed. Text has been added to Section F.3 Allotment Adaptive Management Actions to better clarify the resource concerns that each management action could address.

Rangeland ecosystems such as those found in BLCA and CURE regularly experience high within- and between-year variability in precipitation amount and timing, which can cause large swings in vegetation productivity, cover, and litter amount. Multiple years of monitoring data would be required to evaluate deviations from reference conditions relative to livestock grazing rather than site responses to variations in abiotic conditions. However, nothing precludes the NPS from updating terms and conditions in SUPs outside of the 9-year evaluation period. Updates have been made to Appendix F to clarify that NPS has the full authority to change terms and conditions of SUPs at any point if negative impacts from livestock grazing are apparent.

CONCERN 4: Commenters were concerned that the Alternative B does not include the late brood-rearing stage as part of the GUSG seasonal restrictions and that the EA’s discretionary language such as “as necessary” or “as appropriate” renders the restrictions ineffective.

Response: Alternative B incorporates the most recent science regarding the brood-rearing stage for GUSG. That science, discussed below, indicates that the best option is to leave some discretion in management options to address the on-the-ground environment. Davis et al. 2014’s cited research found the population trend and season were associated with variation in juvenile survival rates, and they cite increased predation pressure, intraspecific competition, and changes in habitat availability and quality as potential reasons for declining juvenile survival (Davis et al. 2013). Other studies with greater sage-grouse also noted lower juvenile survival in autumn (Blomberg et al. 2014, Apa et al. 2017), and lower adult female survival during autumn (Anthony and Willis 2008, Blomberg et. al 2012, Davis et al. 2014). Juvenile greater sage-grouse mortality has primarily been shown to be related to predation, power-line collisions, harvest, climatic conditions, and body condition, with less than 10% of mortality attributed to other factors (Beck et al. 2006, Caudill et al. 2014, and Smith et al. 2024). Previous research has not indicated that grazing has contributed to juvenile survival, although Conway et al. 2025 found grazing treatments had no impact on chick survival to 42 days. After approximately the first two weeks after they hatch, chicks are able to fly. USFWS concurred during informal consultation that during the late brood-rearing period, chicks would likely evade being trampled by livestock and there would likely not be any direct mortality. Additionally, Colorado Parks and Wildlife’s Species Activity Maps do not differentiate brood-rearing and late brood-rearing life stages, so seasonal restrictions would impact the same allotments throughout chick and juvenile life stages. Managing brood-rearing habitats would likely require installation of boundary fencing, sometimes within 0.25 miles of existing fences. Using the Sage-Grouse Initiative’s fence collision analysis tool (SGI Interactive Map) to map risk for fence collision based on terrain and distance to lek (Stevens et al. 2013), most new fencing in late brood-rearing areas would be in medium to high-risk areas for collision. Where NPS could remove existing fencing, new fencing to manage brood-rearing habitat is often in an area with higher collision risk than the current fencing, which

may contribute to increased mortality. While there is some discretionary language, there are adaptive management provisions that require NPS to act if desired condition thresholds are exceeded. Discretionary language allows managers flexibility to address impacts from grazing while minimizing impacts to Gunnison sage-grouse by using the appropriate tools given logistical constraints, such as fencing.

CONCERN 5: The EA does not adequately discuss or prescribe specific management actions for allotments not meeting land health standards.

Response: NPS does not define land health standards as BLM does. For the purposes of this GrMP, standards for rangeland health and function are the desired conditions outlined in the Programmatic Monitoring Plan in Appendix F of the EA, as amended in Attachment B, Errata. Additionally, land health standards not being met on BLM portions of these allotments does not mean that conditions are the same on the NPS portions. NPS lands are often a small fraction of the larger BLM allotments, and it is not always the case that use and conditions on NPS portions of allotments mirror their BLM counterparts. NPS utilized all available condition data, however this EA is programmatic in part because monitoring on NPS portions is necessary to determine a baseline condition and assess the state of these rangelands and potential causes for any consistently observed departures independent of BLM. The Programmatic Monitoring Plan in Appendix F lays out the parks' plans for evaluating the condition of the allotments on NPS managed lands. Additionally, it describes a suite of potential actions that can address resource concerns identified through monitoring. Given that there are several possible actions to address resource concerns, we do not prescribe specific actions; however, the triggers for adaptive management action are identified.

CONCERN 6 The EA should share the forage production, discuss approaches for allocating AUMs between NPS and BLM, and address responses to potential livestock trespass should AUMs be exceeded on NPS lands.

Response: The process of allocating AUMs between BLM- and NPS-managed portions of allotments is being led by the BLM. The BLM intends to determine grazable acreage and allocate existing AUMs proportionally based on grazable acres. Grazable acres are generally evaluated based on factors such as ecosystem type, terrain, and distance from water. As part of the Programmatic Monitoring Plan in Appendix F, NPS will monitor vegetation production annually. While initial AUMs are likely to remain the same over the short-term, monitoring data of annual production will be incorporated to ensure AUMs within NPS allotments are sustainable. If monitoring indicates that there is not adequate production to support the AUMs allocated during the BLM's process, then NPS will reduce AUMs to the appropriate number.

Splitting AUMs between the two agencies could pose potential implementation hurdles as livestock are accustomed to utilizing the entire grazing allotment rather than just a portion. Fences could be constructed to separate the BLM, USFS, and NPS portions of allotments as AUMs will be applied separately; however, this is not mandatory. Should livestock congregate beyond permitted AUMs on one parcel or the other, the park would consider them trespass. Incorporating SUP terms and conditions requiring range riding would be included should trespass be observed. Range riding could be used to spread cattle out when trespass congregation occurs and AUMs are exceeded in a portion of the allotment. In instances where there is consistent, documented trespass and NPS has exhausted all other options of resolving the matter with permittee coordination, the NPS units will handle trespass in accordance with 36 CFR § 2.60(c).

CONCERN 7: The Programmatic Monitoring Plan in Appendix F does not include a definition of adequate residual vegetation.

Response: Residual vegetation is adequate if it meets the conditions necessary for the riparian area to meet Proper Functioning Condition criteria, as identified in the Programmatic Monitoring

Plan (Appendix F). Changes in residual vegetation will be identified through PFC assessments completed every 3 to 5 years.

CONCERN 8: The EA does not inform readers how grazing would be phased out of the park units under Alternative C.

Response: Chapter 2, Section 2.5 of the EA states that grazing within CURE would end when the current permit expires or is due for renewal. Upon expiration of the BLM permit, NPS would retire the NPS portion of the allotment. Under all alternatives, as noted in Section 2.2 of the EA, grazing would cease within BLCA as outlined in its congressional designation. Consistent with Public Law 106-76, Section 4(e), grazing in BLCA would continue for the lifetime of the permit holder as of October 21, 1999; permit transfers, sub-letting, or sub-permitting is prohibited by statute.

Likewise, in Appendix E of the EA, the Comparison of Alternatives Matrix states that NPS would work cooperatively with permittees to phase out grazing within CURE as BLM permits are due for renewal.

CONCERN 9: Commenters ask why trailing buffers are different among trailing routes, and ask why trailing is not included under the phased reduction in grazing under Alternative C.

Response: Alternative C phases out grazing allotments on CURE. However, because of geographic and access limitations on adjacent lands that may preclude alternative access routes, trailing routes within the parks' boundary may continue to be used to gain access to adjacent agencies allotments. To minimize potential resource impacts from trailing, NPS modified the EA (via errata) to include an additional best management practice requiring that trailing routes follow existing roads or similar linear features, where possible, under all alternatives. NPS notes here that trailing buffers developed for the EA are based on observations from park staff. These buffers are based on staff's observations of cattle movement and distribution during trailing activities. Trailing buffers are also based on geographical barriers. Site-specific information, such as private land and judgements, infrastructure, and terrain buffers, are required to establish effective trailing buffers, and these may vary along trailing routes.

CONCERN 10: The proposed action does not conform to the NPS's non-impairment mandate because the EA does not include a consideration of cumulative effects and therefore cannot ensure that there are not unacceptable impacts or impacts that would constitute an impairment to park resources.

Response: The EA includes a discussion of the impact of past, present, and reasonably foreseeable future actions when combined with the impact of each alternative. These actions are described in Table 3.1 of the EA and are included in the impact analysis under the "Trends and Planned Actions" section for each impact topic. The combined effects of these actions and the alternative are discussed within the conclusion section for each impact topic. The impact analysis in the EA also contains a discussion of long-range, reasonably foreseeable future impacts that would occur over the life of the plan. This analysis is a cumulative effects analysis. Cumulative impacts or effects are not required to be separately labeled.

Per the 2025 NPS guidance on non-impairment and the NEPA process, the discussion of impairment is contained within the Determination of No Impairment (DNI) which is appended to the FONSI as Attachment C. As stated in the DNI, the impacts of the selected alternative combined with impacts of other past, present, and reasonably foreseeable future actions would not harm the integrity of park resources or values such that they would not be available to be enjoyed by current and future generations. Section 1.4.7.1 of *NPS Management Policies 2006* also requires the NPS to avoid impacts that it determines to be unacceptable. While a written determination for unacceptable impacts is not required, the NPS determined that there would be no unacceptable impacts while preparing and reviewing the DNI.

CONCERN 11: The WAFWA management recommendations mentioned in the EA are outdated and the new, more stringent guidelines should be included in the EA.

Response: WAFWA management recommendations from 2025 will be adopted and implemented as part of the selected alternative. NPS notes that the current 2025 WAFWA Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat were published on June 13, 2025, after this EA was finalized for the public review period. A reference to the new 2025 WAFWA recommendations has been added via errata to the EA.

CONCERN 12: Disease transmission between domestic and bighorn sheep is still possible with the management actions outlined within the EA. Commenters are concerned about domestic sheep grazing in proximity to bighorn sheep and that effective separation should be 7 miles or greater. The EA should include a risk of contact modeling assessment using up-to-date core habitat and foray data from Colorado Parks and Wildlife.

Response: Per the response under Concern 11, references in the EA have been updated to include WAFWA recommendations from 2025. Current WAFWA recommendations do not specifically reference a 7-mile buffer, but encourage land management agencies, including NPS, to “strive to minimize or eliminate risk when making grazing permit decisions” (WAFWA 2025). This recommendation is in lieu of a previously cited buffer zone of 9 airline miles “to minimize wild and domestic sheep association, which have been replaced by more site-specific habitat modeling approaches” (WAFWA 2012). The NPS will follow the most current WAFWA recommendations.

Colorado Parks and Wildlife (CPW) has been a cooperating agency throughout the development of this GrMP/EA and has not recommended specific mileage buffers or modeling data to be used as a component of the proposed action. NPS will continue to work with CPW to conduct a site-specific Bighorn Sheep Risk of Contact Tool assessment, using available CPW data, and will update site-specific analyses as appropriate when more data become available, and will incorporate additional disease risk information into allotment SUPs moving forward. The NPS recognizes the disease risk associated with domestic sheep allotments that overlap bighorn sheep habitat and will remove domestic sheep grazing where it overlaps with bighorn sheep habitat on NPS-administered lands. In addition to removing domestic sheep grazing authorizations in bighorn sheep habitat on NPS-administered lands, disease risk determinations may also be modified through active monitoring of bighorn and domestic sheep overlap and foray distances based on WAFWA guidelines.

CONCERN 13: Permittee information at the time of the creation of BLCA in 1999 was not disclosed within the EA.

Response: NPS reviews and renews all permits within BLCA as required through the park’s enabling legislation. The enabling legislation for BLCA states that grazing livestock is allowed to continue only where it was already authorized by permits or leases in existence as of October 21, 1999. Additionally, such grazing may not exceed current levels (as of October 1999), and grazing privileges will not be extended or transferred. Individual-owned permits or leases existing as of October 21, 1999, may be renewed for the lifetime of that individual. Permits or leases held by corporations or other legal entities may continue until the last qualifying holder (partner, shareholder, etc.) from October 21, 1999, passes away or the entity terminates—whichever comes first. While NPS did not publish the permittee information the commenter seeks in the EA, more detailed information is available upon request. Because the ultimate cessation date of the permits at BLCA depends on the life of the permittee or the permit-holding entity, there is no way to determine how long these permits may last and therefore this information was not crucial to the analysis in the EA.

CONCERN 14: NPS administration of grazing permits (transfer, reissue, or sublease) in CURE under

Alternative B is not consistent with establishing legislation.

Response: NPS manages grazing in CURE pursuant to the Memorandum of Agreement (MOA) that NPS has with the Bureau of Reclamation. The MOA states that NPS will be responsible for the administration of recreational lands and waters, including visitor services and natural/cultural resource protection, under the authority granted by Section 8 of the Colorado River Storage Project Act (CRSPA), and that NPS will control and supervise grazing activities. Transfer, reissuance, or subleasing of grazing permits at CURE is within NPS's authority as part of this MOA implementing the CRSPA.

CONCERN 15: The EA does not disclose the set forage utilization by livestock within the park units.

Response: Utilization monitoring is one method for ensuring that an area is not being over grazed. However, utilization was not chosen as a primary indicator for the Programmatic Monitoring Plan. The plan allows for utilization monitoring if other metrics indicate the need for supplementary data. Appropriate utilization levels vary depending on the ecological site, condition of the allotment, and allotment-specific goals and objectives, but in most instances, a 25-35% utilization threshold would be used to calculate appropriate stocking rates (clarification added to Appendix F via errata). A 35% utilization threshold was added as the threshold in GUSG habitat to Appendix F via errata. Annual production monitoring will allow the parks to ensure the AUMs are set at a sustainable level. Vegetation height thresholds have also been added to Appendix F via errata stating that in GUSG habitat, vegetation height will be maintained at 3.9-5.9 inches, as described in the Gunnison Sage-Grouse Rangeland Conservation Plan (GSRSC 2005). Additionally, long-term vegetation and soil trends can identify overgrazing or improper livestock distribution that could result in overutilization.

CONCERN 16: The EA acknowledges that water quality issues and livestock grazing adversely impact recreation in the parks and that alternative C would improve the recreational experience for park visitors. However, the EA fails to address the real differences in impacts to recreation among the alternatives, because recreation is dismissed from full analysis even though it is a mandated purpose for the parks.

Response: Section 106 of the NEPA statute requires EAs to be concise and Section 107 requires that EAs be no longer than 75 pages long. The 2015 NPS NEPA Handbook states that environmental analyses should focus on issues of critical importance or those that could be potentially significant. Therefore, the NPS is limited in what impact topics can be fully analyzed in an EA. There is no requirement to fully analyze every impact topic that could be potentially impacted by a proposal. The NPS agrees that recreation is an integral part of the purpose of both park units. However, the impacts to recreation from livestock grazing in the park are minimal, limited to specific areas adjacent to some grazing allotments in CURE, and would decrease under either action alternative described in the EA.

The NPS acknowledges that grazing activities have negatively impacted visitor experience in some areas. The park is aware of USFS livestock trailing that has affected the Ponderosa Campground area of CURE. Park staff have also noted the occasional presence of cattle from the Iola allotment along the Gunnison River on the east side of CURE, which is a popular fly-fishing area. Recreational impacts from livestock in BLCA are rare. With respect to CURE, both Alternatives B and C include measures that will protect recreational experiences, including installing or repairing fencing to keep livestock out of the Ponderosa Campground and riparian areas. The vast majority of recreational opportunities in both parks would continue to be available to park visitors, unimpacted by the presence of livestock within grazing allotments. Recreational trails do not go through grazing allotments and aquatic recreation on the reservoirs is largely unaffected by the presence of livestock and nothing in the alternatives in the EA would alter those conditions. The NPS has revised the dismissal language in Appendix C for "Recreation" to include more detail and context and to remove any unintentional contradictory statements. NPS has revised the language via errata in the EA, in Alternative B and Alternative C descriptions, to

describe specific fencing improvements that would be made in the allotments that have previously impacted recreational experience in CURE.

CONCERN 17: Commenters were concerned that the EA does not list the current condition of the different habitats and riparian/wetland resources found within the park units.

Response: NEPA does not require an exhaustive list of data inventory of all riparian and wetland habitats for the description of current conditions. In this case, NPS, consistent with NEPA requirements, has disclosed the best available information, the wetland inventory data, to best describe the current conditions for riparian and wetland resources. This information is sufficient to determine potential impacts of the action alternatives. NPS recognizes that these ecosystems are not static, and that conditions may change over time.

CONCERN 18: Biological soil crusts will not be restored and protected if grazing is present within the park units, as these soil crusts require 20-50 years without disturbance. Therefore, this is incompatible with 4.4.1 of NPS Management Policies.

Response: The presence of soil crust will be evaluated through time in both park units. Surface cover, which includes the presence of bare soil and soil crusts is an indicator evaluated through time as part of the Northern Colorado Plateau Inventory and Monitoring Network's protocol. Between 2011 – 2022, the Inventory and Monitoring network observed increases in soil crusts in grazed sagebrush shrublands and no trend in either ungrazed sagebrush shrublands or pinyon-juniper woodlands (Livensperger 2025). These data suggest that current livestock grazing may not be degrading soil crusts at these sites. Additionally, while soil crust percent cover is not a separate indicator in the Programmatic Monitoring Plan, deviations from percent bare ground cover, which would include too much bare ground, is an indicator that the parks will use when evaluating grazing impacts to resources.

CONCERN 19: Commenters are concerned with the methodology within the Programmatic Monitoring Plan to establish trend determinations of upland vegetation within the park units. Additionally, commenters are concerned with the utilization of the Interpreting Indicators of Rangeland Health (IIRH) protocol on NPS lands.

Response: Rangeland ecosystems such as those found in BLCA and CURE regularly experience high within- and between-year variability in precipitation amount and timing, which can cause large swings in vegetation productivity, cover, and litter amount. Multiple years of monitoring data would be required to evaluate deviations from reference conditions relative to livestock grazing and not site responses to variations in abiotic conditions. Additionally, while the Interpreting Indicators of Rangeland Health (IIRH) protocol is a primarily qualitative assessment of point-in-time condition, there are several quantitative elements to the protocol. All indicators proposed in the Programmatic Monitoring Plan (percent bare ground cover, percent litter cover, soil stability ratings, relative dominance of functional/structural groups, number of functions/structural groups present, and number of species present) are quantitative and would be rated against quantitative values listed in Ecological Site Description and associated reference sheets. Quantitative data can be utilized to evaluate trends over the evaluation periods described in Appendix F. A more detailed description of specific thresholds has been included (via errata) in Appendix F of the EA for each indicator.

CONCERN 20: The EA does not mention how livestock grazing can affect cheatgrass invasion in sagebrush ecosystems. Commenters suggest that NPS remove grazing where cheatgrass is found.

Response: Potential interactions between grazing and cheatgrass invasion are highly site-specific. The body of scientific literature published on the topic, including targeted grazing for cheatgrass reduction, reports mixed negative, positive, and neutral results. The research article cited by the commenters is itself the subject of much debate (The Art of Range 2020). The extent of

cheatgrass is minimal in CURE. In BLCA, cheatgrass can be found scattered on several grazing allotments and in areas with high litter cover. Recent research has identified a negative relationship between grazing that reduces litter accumulation and cheatgrass seedbank density, suggesting that livestock grazing in areas with dense litter accumulation may limit cheatgrass establishment (Perryman et al. 2020). At a minimum, this suggests that the relationship between cheatgrass and grazing is more complex than a straightforward positive relationship. Due to the lack of previous cheatgrass monitoring on grazing allotments, the potential relationship between cheatgrass and grazing at the parks is unknown. Should future monitoring identify a strong association between livestock grazing and cheatgrass on grazing allotments, adjustments would be made to the grazing system and SUP terms and conditions to limit cheatgrass establishment.

CONCERN 21: How will the NPS monitor livestock grazing impacts to park unit visitor experience?

Response: Conflicts with livestock do not typically represent a significant impact on visitor experience at BLCA and CURE. NPS is responsive to complaints and comments from park visitors and will continue to address site-specific impacts on visitor experience from livestock.

CONCERN 22: Poor water quality in Red Rock Canyon is due to livestock grazing. These threats are not addressed in the proposed action and are inconsistent with the provisions of the Organic Act.

Response: NPS acknowledges that there has been degradation of water resources, as noted in the EA Section 3.8, Water Resources. There is a substantial amount of agriculture upstream of Red Rock Canyon on private lands on Bostwick Park, which impacts water quality in Red Rock Canyon. NPS does not have the authority to address these activities, so completely reducing these impacts is outside of NPS's jurisdiction. Additionally, grazing on private land is likely contributing to E. coli within this drainage. Within BLCA, the grazing lease will expire and grazing will be removed from this drainage within the next year as a condition of the purchase of the property by the NPS, thus eliminating one point-source for contamination within NPS-administered boundaries. However, contamination from outside NPS's boundaries will continue to exist. Within CURE, best management practices under the action alternatives would achieve improved range and environmental conditions and reduce adverse impacts from grazing on water quality.

Per the 2025 NPS guidance on non-impairment and the NEPA process, the discussion of impairment is contained within the Determination of No Impairment (DNI) which is appended to the FONSI as Attachment C. As stated in the DNI, the impacts of the selected alternative combined with impacts of other past, present, and reasonably foreseeable future actions would not result in impairment.

CONCERN 23: The EA did not disclose the availability of forage (AUMs) and water, which were based on historic conditions that no longer exist today.

Response: Under the proposed action (selected alternative), NPS will monitor livestock grazing and adaptively manage the administration of livestock based on monitoring benchmarks. Annual production will be assessed annually and is directly related to the amount of precipitation the park units receive. Additionally, under the proposed action, AUMs will consider annual production. Moreover, permitted AUMs do not always equal actual AUMs utilized. Although there may be enough forage available for livestock, if stock ponds and other water sources are not holding enough water to support the operation, livestock may need to move off an allotment sooner than expected in low water years. NPS's authority to adjust grazing use due to current conditions is outlined in the Drought and Soil Aridification section of the Programmatic Monitoring Plan in Appendix F of the EA.

CONCERN 24: Proper Functioning Condition is not adequate for NPS use to monitor the condition of aquatic and riparian resources within the park units.

Response: Proper Functioning Condition (PFC) is a scientifically accepted method for evaluating the physical functioning of riparian areas. However, it is not intended to evaluate the riparian area for wildlife habitat or ecosystem health. For that reason, PFC is only one part of the overall Programmatic Monitoring Plan. Utilizing PFC as a monitoring tool will allow the parks to assess the hydrology and geomorphology of riparian areas, which is not captured in the other monitoring indicators. By maintaining proper functioning condition, riparian areas will be more resistant to moderate high-flow events (up to 25-year events), but also more resilient in the event of extreme flows.

CONCERN 25: Commenters were concerned that unauthorized range improvements within wilderness would be deemed necessary to support the current grazing operation by grazing permittees instead of at the discretion of the NPS.

Response: The enabling legislation of BLCA requires that grazing in wilderness areas “shall be permitted to continue subject to such reasonable regulations, policies, and practices as the Secretary deems necessary, consistent with this Act, the Wilderness Act, and other applicable laws and National Park Service regulations.” (16 U.S.C. § 410fff-2(e)(2)). Thus, the NPS is still responsible for ensuring that all installations within wilderness areas have been appropriately authorized according to the Wilderness Act, NPS Management Policies 2006, and NPS Director’s Order 41 regarding wilderness management. In authorizing any new or existing grazing installations in wilderness, the NPS must ensure that they are necessary to support the permitted grazing operation, that they are the minimum necessary to support the grazing activities, and that impacts to wilderness resources and character are minimized. The NPS would discuss installations in wilderness with the permittee during the SUP renewal process. The NPS would be responsible for making these necessity determinations, not the permittee. As stated in the EA, Section 2.2, Action Common to All Alternatives, modifications to range improvements within wilderness would be subject to minimum requirements analysis (MRA). If the NPS determines that an existing or proposed installation is not the minimum necessary to support the permitted grazing activity, the installation could be removed or downsized as appropriate. Unauthorized range improvements or other installations would be removed as they are cataloged by NPS.

Also, the only existing grazing permit within wilderness (Green Mountain allotment) will eventually expire and impacts to wilderness character would decline over the long-term, especially after the NPS removes existing grazing installations after permit expiration.

CONCERN 26: Commenters were concerned with trespass livestock and how the NPS will prevent trespass grazing onto wilderness lands, particularly from the Dead Horse Commons allotment.

Response: NPS will continue to coordinate with permittees to remove active trespass and prevent cattle from trespassing onto NPS-administered lands. The NPS would only construct a fence if other, less impactful methods of preventing livestock trespass were not successful, due to fence construction’s potential impacts on wilderness character. NPS will continue to encourage use of techniques to prevent trespass in wilderness along adjacent allotments, such as Dead Horse Commons. NPS will coordinate with permittees to implement strategies such as range riding, virtual fencing, or other cooperative opportunities to prevent trespass.

CONCERN 27: Commenters disagreed that Alternative B would result in beneficial impacts to wildlife because the no-action alternative should be “no grazing”. Therefore, authorizing non-native livestock will have adverse ecological effects.

Response: The no action alternative described in the EA is consistent with Section 46.30 of the 2008 Department of Interior NEPA regulations (which were in place at the time NPS initiated NEPA review). The 2015 NPS NEPA Handbook which in the context of management planning, provides that no-action is “no change from a current management direction”. The NPS determined that the no-action alternative should represent the continuation of grazing as currently

authorized in the parks because it represents “no change” from the current management status. The EA also analyzed the cessation of grazing under Alternative C, which allows for a comparison to a scenario where there would be no livestock grazing on NPS lands once existing permits expire. The EA is consistent with appropriate DOI, CEQ, and NPS NEPA requirements in place at the time NPS conducted its NEPA review in that the no-action alternative is the continuation of current management into the future and should serve as the baseline for analyzing environmental effects.

CONCERN 28: The EA does not comply with 2006 NPS Management Policies, specifically Section 4.4.1 regarding the management of biological resources. More specifically, the NPS must preserve native plants and animals and minimize human impacts on these ecosystems.

Response: The NPS is permitted to allow activities in park units that adversely affect biological resources as long as those impacts do not rise to the level of unacceptable impacts or impairment, per Section 1.4.7 of *NPS Management Policies 2006*. As described in the impact analysis for the proposed action, the conditions of vegetation, water resources, wildlife and soils should improve due to the Programmatic Monitoring Plan and updated grazing permit terms and conditions if/when environmental triggers are met. Under the proposed action, the NPS will manage grazing to NPS standards, which includes adherence to NPS Management Policies and the requirements of the Organic Act. The action alternatives also include the eventual removal of grazing activities at BLCA, consistent with the enabling legislation for the park. This should also contribute to the preservation of native plants and animals and minimize human impacts on ecosystems, consistent with NPS management policies.

CONCERN 29: The EA is missing critical information and does not take a “hard look” at the impacts” and the NPS should allow for a subsequent comment period after additional changes have been made to the EA.

Response: Consistent with CEQ, DOI, and NPS NEPA requirements in place when the NPS prepared the EA, the NPS provided sufficient detail in the EA to properly analyze the reasonably foreseeable effects of the alternatives, based on information available at this time. This EA is mostly programmatic in nature and includes descriptions of site-specific actions and impacts where possible. As noted, in Section 1.4, Scope of the Analysis, in the EA, “Impacts from the programmatic actions are broadly analyzed based on what is known or can be reasonably assumed as this time. Once the NPS completes detailed monitoring of grazing allotments, the specific location and scope of potential actions will become apparent. Once the scope and design are sufficiently developed for site-specific actions, additional project-level environmental and cultural review, analysis, and compliance would be completed as appropriate prior to implementation”. As noted in this Attachment (public comment responses), text has been revised or added to the EA (Attachment B in the FONSI, Errata) based on comments received during public review of the EA, to provide additional detail and context where appropriate. The NPS followed applicable CEQ, DOI, and NEPA requirements for public review of an EA that were in place when the NPS prepared the EA and has addressed and responded to all substantive public comments received. These updates did not substantially change the alternatives considered, the analysis in the EA, or the finding that there would be no significant impacts; nor does NEPA require an additional public review period for an EA or FONSI.

CONCERN 30: Commenters were concerned that the impact analysis in the EA was conclusory because it stated that the NPS “could” alter grazing permit conditions and that the impact analysis indicated that these actions “would” reduce impacts.

Response: NPS recognizes that the way the EA was written in some sections leaves a level of uncertainty to the reader regarding specific actions that would result from not achieving monitoring benchmarks or noncompliance with SUP terms and conditions. To that end, NPS has made modifications to the EA via errata (Attachment B) to strengthen the language regarding

alterations of permit terms and conditions as a result of monitoring. To clarify, NPS would alter the terms and conditions of SUPs if livestock grazing is resulting in a marked departure from desired conditions, if monitoring benchmarks are not met, or if there is noncompliance with SUP terms and conditions. However, NPS would have the discretion as to whether specific modifications are needed based on the intensity of impacts or noncompliance. For example, noncompliance of rangeland infrastructure maintenance may result in a different administrative action or adjustment to terms and conditions, when compared with substantial reductions in annual production, which could result in reductions in AUM or duration of use adjustments in SUPs. Any changes in permit terms will be evaluated to determine whether additional compliance is required.

CONCERN 31: The proposed alternative lacks prescription of lek area protections or buffers and the protections only apply to surface-disturbing activities. Additional seasonal restrictions and lek buffers should be added to the list of Gunnison sage-grouse management directives within the EA.

Response: A 1.0-mile buffer around leks of any status would intersect the allotments at Stevens Creek Commons, Steuben Creek, Iola, Sapinero Mesa, Pine Mesa, Grizzly Gulch, and Green Mountain. All of these allotments are currently and would remain closed to seasonal grazing from March 15 – May 15, overlapping the breeding season and providing seasonal protection. Consultation with the USFWS did not indicate that unoccupied habitat should be removed from grazing. Additional protections within a lek buffer are beyond the scope of the GrMP unless it involves installation of structures specifically related to grazing, which would undergo site-specific compliance and would include appropriate installation timing restrictions. All other activities with potential negative impacts on GUSG would go through separate compliance processes.

CONCERN 32: The EA does not adequately fulfill obligations under Section 7 of the Endangered Species Act analyze the impacts of livestock grazing on listed species and their habitat. Commenters state that the Section 7 ESA species determinations in the EA are not correct.

Response: NPS does not expect significant alterations of habitat from the actions outlined in the EA. As stated in the response to Concern 27, the impact analysis in the EA uses the no-action alternative as the baseline for comparison of the action alternatives. The NPS determined that the no-action alternative should represent the continuation of grazing as currently authorized in the parks. Therefore, the baseline condition includes previous and ongoing impacts from the presence of livestock. The EA analyzes the impacts of the proposed action on these existing conditions, and thus the actions are not likely to adversely affect ESA listed species. In their August 8, 2025 correspondence (Attachment D), the USFWS concurred with the NPS that the proposed action would not likely adversely affect federally listed species or designated critical habitats. Over the long term, the proposed actions in the EA are likely to beneficially affect wildlife and their habitat through increased monitoring and the use of adaptive management principles to improve environmental conditions in grazing allotments.

CONCERN 33: Commenters are concerned that prohibiting livestock within occupied GUSG habitat or other seasonal restrictions will lead to potentially increased impacts on areas outside of GUSG habitat during these restrictions.

Response: Impacts from livestock management, including seasonal restrictions in GUSG habitat, have been analyzed for all applicable resources in the EA, including those resources located outside of GUSG habitat. It is anticipated that livestock operations will modify their grazing rotation in a manner that avoids GUSG habitat during seasonal restrictions, while also employing strategies to avoid substantial impacts to areas outside of GUSG habitat. Allotments will all be managed to meet desired conditions as outlined in Appendix F of the EA, specific to the goals and objectives of each allotment, inside and outside of GUSG range.

CONCERN 34: The EA should reference the allowance of wolf management through the 10(j) rule on all federal lands, regarding the harassment and taking of wolves.

Response: In alignment with the 10(j) experimental population designation, NPS will coordinate with CPW on wolf management activities within its boundaries. As stated in the EA, NPS acknowledges the management actions that can be taken under the 10(j) rule pursuant to CPW's authority.

CONCERN 35: NPS should implement a carcass management program and best management practices to reduce wolf-livestock conflicts and interactions within the park units.

Response: NPS believes that carcass management is best incorporated into individual SUPs, rather than a livestock carcass management program.

Generally, consistent with NPS Management Policies, NPS would not remove livestock carcasses except in isolated cases, as there could be cascading effects into natural communities through removal of decaying matter that provides sustenance for decomposers including insects, mammals, and birds. In terms of wolf attractants that may originate from grazing operations, NPS will include carcass management provisions within specific SUPs, so that operators would be instructed to remove livestock carcasses in the event that there is wolf activity within the park units. Also, it should be noted that cattle and sheep are not calving or lambing within NPS-administrative boundaries, so neither newborns nor afterbirth from livestock are present on park lands. Text has been added to Appendix D of the EA via errata regarding carcass management and specific grazing SUPs.

ATTACHMENT B: ERRATA INDICATING TEXT CHANGES TO THE ENVIRONMENTAL ASSESSMENT

INTRODUCTION

This errata documents changes (corrections and minor revisions) to the text of the EA as a result of comments received on the EA during the public review process, as well as other corrections.

Page numbers referenced pertain to the EA released to the public for review on May 28, 2025. Original text from the EA is included to provide context and to allow for comparison to the text change. Additions to text are underlined, and deleted text is shown by ~~strikeout~~.

ERRATA

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Where domestic sheep grazing occurs, NPS will use the Western Association of Fish and Wildlife Agencies' "Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat" (WAFWA ~~2012~~ 2025).

Permitted animal unit months² (AUMs) on NPS-administered lands previously under BLM administration would initially be determined in coordination with BLM on shared allotments that overlap the park units. BLM and NPS would coordinate to proportionally divide AUMs based on grazable acreage. Total permitted AUMs across shared allotments are likely to remain the same over the short term. Over the long term, AUMs and terms and conditions, including livestock kind in the case of domestic sheep, may be adjusted through an NPS, BLM, or USFS decision, or a combination of NPS and BLM/USFS decisions made through consultation.

² An Animal Unit is considered to be one mature cow of about 1,000 pounds, either dry or with calf, up to 6 months of age, or their equivalent, and an Animal Unit Month (AUM) is the amount of forage required by one animal unit for a standardized period of 30 days.

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Under all alternatives, NPS would incorporate design features, best management practices, and mitigation measures (refer to Appendix D) to minimize, avoid, or eliminate impacts on resources caused or affected by alternative actions. Under all alternatives, boundary fencing would be constructed to prevent livestock access to the Ponderosa Campground.

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While NPS would administer all grazing and trailing activities within CURE and BLCA boundaries, the terms and conditions of SUPs administered by NPS would be identical to their counterpart permits on USFS- and BLM-administered lands with applicable total AUMs within each agency's permit. AUMs allocated by the BLM to NPS allotments (based on grazable acres) would remain the same. On all grazing allotments with shared boundaries⁴, NPS would issue 1-year livestock SUPs that maintain the terms and conditions found in USFS and BLM permits.

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On allotments with shared management with BLM, NPS SUPs would incorporate the appropriate livestock management guidelines to retain adequate residual vegetation⁶ in riparian areas to maintain healthy, native riparian plant communities and to prevent accelerated erosion of riparian soils.

⁶ Residual vegetation will be considered adequate if the vegetation conditions meet the necessary criteria for proper functioning condition (PFC) as identified in the Programmatic Monitoring Plan (Appendix F)

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NPS SUPs would be renewed during annual pre-season meetings, on a schedule coordinated with independent of BLM's and USFS's permit renewal process, including pre-season, interagency Annual Operations meetings with permittees.

During annual pre-season meetings, NPS would renew or issue new SUPs for grazing in accordance with 36 CFR § 2.60 - Livestock use and agriculture. AUMs allocated by the BLM to NPS allotments (based on grazable acres) would remain the same in the short term but may be lowered based on annual production or range condition. New SUPs may adjust the timing, duration, and intensity of grazing activities, and implement other new or supplementary terms and conditions to meet resource objectives to be consistent with goals for the park units.

Resource objectives would be ~~discretionary and~~ informed by monitoring, and each SUP may have specific objectives for an allotment depending on ecological site conditions (refer to Appendix F for specific information regarding monitoring goals, objectives, and thresholds). In CURE, after 5 consecutive years of non-use, park managers would consider retiring the allotment through a public process. Alternatively, grazing permits could be transferred, reissued, or subleased at the superintendent's discretion. If BLM were to transfer or sublease a grazing permit to a new party, NPS could reissue a new SUP for the remaining duration of the permit at the discretion of the park superintendent.

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This alternative would prioritize repair of water developments that do not currently meet NPS standards (such as those that are not providing adequate water for ~~the livestock and wildlife for which they are intended~~) and...

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Under Alternative B, NPS would ~~make management decisions to~~ remove domestic sheep grazing authorizations in bighorn sheep habitat on NPS-administered lands ~~within CURE~~. Currently, there are 4 sheep grazing allotments which overlap bighorn sheep habitat, for a total of 4,033 acres (Table 2-1). To prevent disease transmission to bighorn sheep, domestic sheep grazing on any allotments with bighorn sheep habitat, including instances where there is future bighorn sheep habitat expansion, would end when the current BLM grazing permit expires within CURE. Permittees would be given the option to shift their permitted livestock kind to cattle. If BLM or USFS make a management decision to prohibit domestic sheep grazing on an allotment with a shared boundary prior to the permit expiring, NPS would also end domestic sheep grazing on their portion of the allotment. Domestic sheep grazing within BLCA would end with the life of the current grazing permittee or if the grazing permit is voluntarily relinquished. In accordance with the 2025 WAFWA guidelines, the NPS will work with CPW as data becomes available to conduct Bighorn Sheep Risk of Contact Modeling to identify other potential locations where disease transmission is possible.

Page 18

Under Alternative B, the GrMP will address the protection of soils, riparian-wetland areas, native plant communities, special status species, and water quality within livestock grazing allotments. To reduce impacts on these resources, NPS will conduct monitoring of standards, guidelines and thresholds outlined in allotment-specific monitoring plans and SUPs. ~~NPS would address the protection of soils, riparian-wetland areas, native plant communities, special status species, and water quality within livestock grazing allotments to meet the standards, guidelines and thresholds outlined in allotment-specific monitoring plans and SUPs.~~ Thresholds could include monitoring of forage production, riparian condition, and long-term soil and vegetation trends, among others (refer to Appendix F for more information). NPS would prioritize management techniques to prevent livestock from entering riparian-wetland areas, including,

but not limited to riparian fencing, including total exclusion and water gaps; creation of upland water developments to draw livestock away from riparian areas; requirements in SUPs to establish range-riding activities to prevent concentration of livestock in riparian areas; and the use of salt and mineral supplements in upland environments through park superintendent approval outlined in permit terms and conditions (Appendix E).

Page 18

Through management alterations to livestock season of use, duration, and utilization within allotments, NPS would aim to retain adequate residual vegetation in riparian areas to maintain healthy, native riparian plant communities and to prevent accelerated erosion of riparian soils. Adequate residual vegetation would meet the criteria for Proper Functioning Condition. Where livestock grazing is not allowing riparian areas to retain adequate residual vegetation, NPS would incorporate appropriate livestock management guidelines into livestock grazing permits based on ecological site potential conditions. Refer to Appendix F for a full discussion of desired conditions.

Page 19

Under Alternative B, NPS would implement a formal monitoring and adaptive management program (Appendix F). ~~NPS would expand its current long-term upland soils and vegetation monitoring program to include all allotments within NPS-administered boundaries.~~ The monitoring plan would provide desired conditions, objectives, and thresholds regarding resources that are present within each grazing allotment and provide NPS with a variety of monitoring methods to measure these thresholds. These thresholds and objectives ~~will~~ would be outlined within individual SUP terms and conditions.

Monitoring and evaluation of livestock grazing would be used to determine if range conditions are being maintained at—or are moving away from—desired conditions. Monitoring data would be used to adjust grazing management strategies and use as appropriate. NPS could alter the distribution, timing, duration, and intensity of grazing, as well as stocking rate, to maintain or prevent further degradation of resources, including rest of pastures. Adjustments to timing and duration of grazing could include changes to on-and-off-dates or alterations to pasture rotation. Likewise, trailing routes could be altered in response to forage and range conditions or impacts on other park resources. NPS would implement annual monitoring of livestock grazing and work with the Northern Colorado Plateau Network Inventory and Monitoring program to utilize their long-term upland vegetation and soils data ~~establish at least one long-term upland vegetation monitoring plot per grazing allotment~~ to document the effectiveness of management actions and conservation measures. Site-specific monitoring would inform grazing management for respective areas, typically within 3-5 years after the initiation of monitoring in a given allotment.

Page 38

NPS could alter terms and conditions in allotment-specific SUPs to better conserve GUSG habitat if monitoring data indicate habitat degradation, including adjusting season of use, intensity, and duration of grazing; ~~or terminating grazing where there has been documented and repeated noncompliance with SUP terms and conditions; or increasing flexibility and range of responses to habitat degradation.~~

Page 40

Presence of livestock in GUSG brooding habitat would be restricted in Green Mountain until July 15th. ~~and Grizzly Gulch allotments currently have~~ a turn-out dates of July 12th. NPS would work with permit holders to restrict cattle access in brooding areas until after July 15th. In Stevens Creek, livestock trailing would be restricted to established linear routes to prevent impacts on GUSG. In Pine Mesa, cattle would be restricted from mapped GUSG habitat on the top of the mesa prior to July 15th.

Page 43

In early July 2025, lightning strikes ignited two fires on both rims of the Black Canyon. The South Rim Fire, starting July 10, grew rapidly to 4,232 acres or approximately 14 percent of BLCA's total acreage. The smaller North Rim fire was extinguished quickly and caused little damage. The South Rim fire

burned unevenly across the landscape, producing a mosaic of burnt vegetation patches and untouched green vegetation. The fire caused extensive and visible vegetation loss, particularly among mature trees and shrubs. However, the natural mosaic of burned and unburned zones increases the likelihood for resilient regrowth. Elevated containment efforts brought the fire to around 50 percent containment by late July 2025.

Page 46

Recent findings from NPS show that BLCA and CURE have warmed rapidly over the past few decades and are predicted to continue to warm (National Park Service 2024b, 2024c, as cited in Livensperger 2025). The changing temperature and reduced water availability in the park units were linked to a reduction in native grass cover in most vegetation types (Livensperger 2025). As temperatures rise and precipitation patterns shift, water shortages will continue to negatively influence these habitats. Shifting temperature and precipitation patterns have the potential to lead to changes in the amount and type of vegetation present in the parks.

Page 49

Additionally, NPS would remove limit domestic sheep grazing in proximity to bighorn sheep habitat in NPS-administered lands. This would reduce the impacts on vegetation from grazing in these areas and would improve vegetation conditions in these allotments over the long term by removing or reducing grazing pressure and the spread of invasive and noxious plant species to a greater degree than under Alternative A. However, domestic sheep permittees would have the opportunity to alter the kind of livestock grazed (e.g., to cattle). These beneficial impacts would be negated if the permittee decided to alter the kind of livestock grazed in lieu of domestic sheep.

Page 58

NPS would implement seasonal habitat restrictions for grazing allotments within GUSG habitat. NPS would immediately implement SUPs with terms and conditions that would aid in improving GUSG habitat. ~~Alternative B does not prohibit livestock grazing within GUSG habitat during seasonal restrictions compared to Alternative A.~~ During seasonal restrictions, impacts on soils from livestock grazing would be reduced in grazing allotments with GUSG habitat under Alternative B.

Page 59

~~The management of domestic sheep grazing within the park units would be similar to what is described in Alternative A. However, d~~Domestic sheep grazing would ~~could~~ be terminated or reduced under Alternative B will ~~may~~ give sheep permittees the option to convert to cattle grazing operations. The impacts to soils under Alternative B would remain the same as Alternative A or could increase on allotments where sheep grazing are converted to cattle.

Page 60

~~The management of domestic sheep grazing would be similar to what is described in Alternative A. However, s~~Soil impacts from livestock grazing within these allotments would be reduced and eliminated over time as grazing permits expire within CURE, are relinquished, or end with life of the grazing permittee within BLCA under Alternative C.

Page 79

On allotments with shared agency management, NPS would adopt WAFWA standards or management practices to reduce conflict between domestic sheep and bighorn sheep. This action ~~could~~ would affect four domestic sheep grazing authorizations where 4,033 acres (22 percent of grazing allotment acres) of domestic sheep grazing allotments overlap with bighorn sheep habitat. Sheep grazing permittees would

have reduced land to utilize for grazing, and possible changes in schedules/distribution which in turn would reduce their grazing operation capacities under Alternative A.

Page 81

~~Domestic sheep grazing would be managed in Alternative B similar to what is described in Alternative A. However, domestic sheep grazing could~~ would be either eliminated or reduced to mitigate for conflicts between domestic and bighorn sheep depending on site specific conditions. Domestic sheep grazing ~~could~~ would be removed from up to 7,115 acres (40 percent) of grazing allotments under Alternative B. The impacts from eliminating domestic sheep grazing on livestock grazing operations under Alternative B would be greater than under Alternative A. However, domestic sheep permittees would have the opportunity to switch their livestock operations to cattle. There would be an increase in cost and labor associated with purchasing equipment and other supplies required for cattle grazing operations.

Page 82

~~The management of domestic sheep grazing in bighorn sheep habitat will have similar impacts on domestic sheep grazing as described under Alternative A. However,~~ Alternative C would end sheep grazing within the park units over time as sheep grazing permits expire within CURE, are voluntarily relinquished, or end with the life of the permittee within BLCA. Alternative C would result in more impacts to livestock grazing compared to Alternative B as sheep grazing permittees would not be able to change livestock classes in order to continue their livestock grazing operations within the park units. Sheep permittees livestock operations would be reduced under Alternative C compared to Alternative A and B.

Page 90, Section 4.2.2 National Historic Preservation Act

~~National Historic Preservation Act Section 106 compliance consultation is currently being conducted with the Colorado State Historic Preservation Office and federally recognized tribes in accordance with 36 CFR Section 800.8(a)(1).~~

As described in Section 1.4/page 2 of the EA, the: “impacts from the programmatic actions are broadly analyzed based on what is known or can be reasonably assumed as this time. Once the NPS completes detailed monitoring of grazing allotments, the specific location and scope of potential actions will become apparent. Once the scope and design are sufficiently developed for site-specific actions, additional project-level environmental and cultural review, analysis, and compliance would be completed as appropriate prior to implementation”. The Agency Official for Section 106, as stipulated in 36 CFR 800.2(a), has determined that this EA is defined as “nondestructive project planning,” as stipulated in 36 CFR 800.1(c), because the actions of the EA do not restrict the subsequent consideration of alternatives to avoid, minimize, or mitigate any adverse effects that might result from the implementation of undertakings, as defined in 36 CFR 800.16(y), associated with this EA. The park will execute a Programmatic Agreement, as stipulated in 36 CFR Part 800.14(b), to govern how Section 106 compliance will be completed for the undertakings initiated or developed from this EA.

Page A-8, Appendix A

WAFWA (Western Association of Fish and Wildlife Agencies). Wild Sheep Working Group ~~2012~~ 2025. Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat. Wild Sheep Initiative. June 13, 2025.

Page C-2, Appendix C, Table C-1

~~The cultural resources related best management practices and mitigation measures contained within Appendix E (Section E.5) would be incorporated into undertakings tiered to this EA to facilitate continued compliance with Section 106 of the NHPA, including avoidance or buffering of historic or~~

~~potentially historic properties and additional inventories as appropriate.~~

Page C-3, Appendix C, Table C-1

Recreation in the park units is managed by NPS, and livestock conflicts are rarely documented, but currently addressed on a case-by-case basis. However, the NPS acknowledges that occasional impacts to recreation in the Ponderosa Campground area and along the Gunnison River near the east side of CURE have occurred. There have been no notable impacts to recreation from livestock at BLCA since the NPS built the Grizzly Gulch allotment fence between 2010 and 2017. With respect to CURE, both alternatives B and C include measures that will protect recreational experiences in these areas by installing or repairing fencing to keep livestock out of the Ponderosa Campground and riparian areas. The vast majority of recreational opportunities in both parks would continue to be available to park visitors, unimpacted by the presence of livestock within grazing allotments. Recreational trails do not go through grazing allotments and aquatic recreation on the reservoirs is largely unaffected by the presence of livestock and nothing in the alternatives in the EA would alter those conditions. The timing of grazing activities that occur in proximity to popular recreation areas, such as around the reservoir and designated campgrounds, does not correlate with the timing of high recreational use. By peak visitor use season, cattle have already been moved to higher up elevations on their allotments, reducing the frequency and likelihood of conflict. Although Alternative C would eventually remove livestock from NPS-administered lands, the specific measures contained in Alternative B should reduce recreational impacts to a level similar to NPS lands under Alternative C. The actions described under Alternative B and Alternative C would not directly impact or benefit recreation compared to existing conditions. Under Alternative C, recreation opportunities and experiences would be improved as a direct result of the cessation of grazing. Because the impacts to recreation would be the same under each of the alternatives, a detailed analysis of recreation would not be necessary to make a reasoned choice among alternatives and expected adverse impacts are infrequent, limited in scope, and fairly similar among the action alternatives. ~~Therefore, the topic of recreation was considered but dismissed from detailed analysis in this EA.~~

Page D-1, Appendix D, Section D.1 Native Plant Communities

- Trailing routes will be prioritized onto previously disturbed surfaces, such as paved, dirt, or two track roads, where feasible

Page D-8, Appendix D, Section D.6 Cultural Resources

Best management practices and mitigation measures for cultural resources will be developed and implemented as part of a Programmatic Agreement as stipulated in 36 CFR Part 800.14(b), which will govern how Section 106 compliance will be completed for the undertakings initiated or developed from this EA.

- ~~Well in advance of individual project authorization, the NPS archaeologist will determine the area of potential effects, inventory needs, and consultation needs for each site specific project tiering off this EA. Projects that may affect cultural resources include water improvements, fencing, road and stream crossing improvements, removal of structures, or stream restoration and enhancement activities. If concerns are identified, design modifications may be required. The project may be delayed if it is determined that supplemental analysis is needed, or the project may not be constructed if design modifications cannot avoid resource concerns.~~
- ~~Before any projects are authorized, Section 106 compliance activities will be completed in accordance with NPS protocol.~~
- ~~Eligible and unevaluated cultural resource sites will be avoided, if present prior to ground disturbance. Sites that are not eligible would not be avoided, unless requested by a tribe or consulting party.~~

- ~~• A 30-meter buffer around historic properties and unevaluated resources will be implemented any time heavy equipment, such as backhoes and bulldozers, are utilized in the construction of the project.~~
- ~~• A larger affected area corridor or buffer will be analyzed for potential project impacts, allowing flexibility in actual project placement to avoid eligible and unevaluated cultural resources.~~
- ~~• Projects will not be constructed if design modifications cannot avoid adverse effects on any National Register-eligible or unevaluated archeological site(s), architectural resource(s), or traditional cultural place(s) that may be present.~~
- ~~• The NPS archaeologist may determine the size of buffer zones on a case-by-case basis. NPS may consult architectural historians to determine appropriate viewsheds for historic resources. NPS will consult knowledgeable Native Americans when the use or size of protective buffers for Native American traditional or cultural properties needs to be determined.~~

Page D-10, Appendix D, Section D.10 Wildlife

- NPS will include carcass management provisions within allotment-specific SUPs; operators would be instructed to remove livestock carcasses if there is known wolf activity within the immediate vicinity of the allotment.

Page E-4, Appendix E, Comparison of Alternatives Matrix, Alternative A

Prohibit the presence of livestock or other surface-disturbing activities that alter the vegetation, surface/near surface soil resources, or surface geologic features, beyond natural site conditions and on a scale that affects other public land values relating to the administration of livestock in occupied habitat during lekking, nesting, or early brood-rearing from March 1 to July 15.

Page E-4, Appendix E, Comparison of Alternatives Matrix, Alternative B

In GUSG habitat, in coordination with the appropriate state, federal, and local government agency, apply seasonal restrictions, as appropriate, to manage and reduce discretionary disturbances from livestock grazing, including scheduled maintenance and administrative activities, or other uses specific to the management of livestock to prevent disturbance to GUSG populations and habitat during seasonal life cycle periods as follows²⁴:

- In breeding/lekking areas no entry from March 15 to May 15
- In nesting habitat no entry from March 15 to May 15
- In brood-rearing habitat no entry from May 15 to July 15

NPS would defer the presence of livestock during lekking, nesting, and brooding seasons (March 15 to July 15) on allotments where there is overlap with those areas (Figure 3-2 and Figure 3-3).

²⁴~~Livestock grazing is not considered a surface-disturbing activity. Livestock grazing is a surface presence. However, there are other activities associated with livestock grazing that are considered surface disturbances which include but are not limited to the maintenance and construction of range improvements and infrastructure.~~

Page E-8, Appendix E, Comparison of Alternatives Matrix, Alternative B

Remove domestic-sheep grazing authorizations in bighorn sheep habitat on NPS-administered lands. This would include the following allotments:

- Green Mountain
- Highway
- Rawhide/Coffee Pot
- Sapinero Mesa

NPS would not reissue domestic sheep grazing authorizations where it overlaps with current and future occupied habitat; NPS would not issue new SUPs for domestic sheep grazing. NPS would allow permittees the option of altering the kind of livestock in lieu of domestic sheep grazing. In accordance with the 2025 WAFWA guidelines, the NPS will work with CPW as data becomes available to conduct Bighorn Sheep Risk of Contact Modeling to identify other potential locations where disease transmission is possible.

Page F-1, Appendix F

If monitoring data indicate that livestock grazing/trailing is negatively impacting resources and rangelands such that they are not maintaining or moving towards desired conditions, this ~~may~~ would lead to adaptive management actions that would be coordinated with permittees.

Page F-2 and Page F-3, Appendix F

The threshold for desired condition for rangelands is no more than 2 of the 4 indicators ~~not meeting~~ ~~trending away from~~ desired conditions over 3 consecutive evaluation periods. If 3 of the 4 indicators are ~~trending away~~ departed by a specific amount or in a specific way from desired conditions for 3 consecutive evaluation periods (9 years), this would trigger adaptive management which could include alteration of the grazing system (duration, timing, distribution, and intensity of grazing) or AUMs, depending on what is most appropriate for the allotment and indicator(s) of concern. While NPS staff would rely on monitoring data to guide adaptive management actions, the Superintendent has the authority to adjust SUP terms and conditions at any point via written notice to permittees if negative impacts from livestock grazing to resources are apparent, in response to unexpected conditions (i.e., drought, wildland fire), or to ensure beneficial land treatment outcomes (i.e. invasive species treatments, seeding, or other restoration activities). NPS staff will communicate with permittees regarding potential alterations.

Desired conditions for upland rangelands are as follows. Specific values for each ecological site can be found in the associated reference sheet (<https://edit.jornada.nmsu.edu>). Departure beyond these thresholds would trigger adaptive management:

- Percent bare ground cover: Slight to Moderate departure from values in the ESD reference sheet
- Percent litter cover: Slight to Moderate departure from values in the ESD reference sheet
- Soil Stability: Slight to Moderate departure from values in the ESD reference sheet
- Functional/Structural group rating
 - Relative dominance: Subdominant functional/structural group has become minor or trace, or a minor or trace functional/structural group has become subdominant
 - Functional/Structural groups not expected at the site: Functional/Structural group(s) is now trace
 - Number of expected functional/structural groups: Missing \leq 25% expected functional/structural groups
 - Total combined number of species expected in dominant and subdominant functional/structural groups: Missing 10-25%

Desired conditions for riparian areas are as follows. Departure beyond these thresholds that would trigger

adaptive management:

- Percent bare ground cover: Slight to Moderate departure from values in the ESD reference sheet
- Percent litter cover: Slight to Moderate departure from values in the ESD reference sheet
- Soil Stability: Slight to Moderate departure from values in the ESD reference sheet
- Functional/Structural group rating⁵
 - Relative dominance: Subdominant functional/structural group has become minor or trace, or a minor or trace functional/structural group has become subdominant
 - Functional/Structural groups not expected at the site: (Functional/Structural group(s) is now trace
 - Number of expected functional/structural groups: Missing \leq 25% expected functional/structural groups
 - Total combined number of species expected in dominant and subdominant functional/structural groups: Missing 10-25%
- Riparian areas are in Proper Functioning Condition

Desired conditions for Gunnison sage-grouse habitat are as follows. Departure beyond these thresholds would trigger adaptive management:

- Percent bare ground cover: Slight to Moderate departure from values in the ESD reference sheet
- Percent litter cover: Slight to Moderate departure from values in the ESD reference sheet
- Soil Stability: Slight to Moderate departure from values in the ESD reference sheet
- Functional/Structural group rating
 - Relative dominance: Subdominant functional/structural group has become minor or trace, or a minor or trace functional/structural group has become subdominant
 - Functional/Structural groups not expected at the site: (Functional/Structural group(s) is now trace
 - Number of expected functional/structural groups: Missing \leq 25% expected functional/structural groups
 - Total combined number of species expected in dominant and subdominant functional/structural groups: Missing 10-25%
- Stubble height metrics are maintained at 3.9 - 5.9 inches as described in Appendix H: GUSG Structural Habitat Guidelines of the 2005 Gunnison Sage-grouse Rangewide Conservation Plan (GSRSC 2005).
- Utilization is no more than 35%

Page F-4, Appendix F

Adaptive management actions ~~would~~ will be implemented if monitoring indicates that range conditions will not support the current grazing system, or desired vegetation and soil conditions are not being maintained or achieved due to livestock grazing.

Page F-5, Appendix F

Livestock Grazing System:

Season of use or on/off dates – Season of use could be adjusted based on the following:

⁵ Pellant, M., P.L. Shaver, D.A. Pyke, J.E. Herrick, N. Lepak, G. Riegel, E. Kachergis, B.A. Newingham, D. Toledo, and F.E. Busby. 2020. Interpreting Indicators of Rangeland Health, Version 5. Tech Ref 1734-6. U.S. Department of the Interior, Bureau of Land Management, National Operations Center, Denver, CO

- Overall condition of range vegetation and soils,
- Weather or climatic conditions,
- Observed impacts on sensitive species, riparian areas, and/or recreation areas, or
- To achieve resource conditions as part of an IPM plan.

Examples of resource concerns this adjustment can address include allowing key species to rest during critical growth stages, avoiding grazing the same individuals at the same time multiple years in a row, soil erosion due to grazing during wet conditions (i.e., snow runoff or rainy season), and invasive species by targeting them when they are most palatable (such as cheatgrass).

Livestock distribution – Develop and implement mechanisms to provide for better distribution to enhance efficient forage utilization and minimize the effects of livestock congregation. Concepts could include the following:

- Placing supplements in strategic locations with NPS imposed restrictions (included in SUPs) to achieve desired distribution and establish a minimum distance of 0.25 mile between areas where supplements are placed and populations of sensitive species or water sources occur, or
- Establishing new fences, or
- Using supplements to increase utilization of undesirable vegetation as part of an IPM approach, or
- Using riders on horseback to move livestock within pastures to improve distribution in response to weather as well as water and forage availability.

Examples of resource concerns these adjustments can address include overgrazing and soil compaction in desirable areas (i.e. near water, shade, and flatter terrain) and erosion from bank trampling in riparian areas.

Stocking rates and duration of use – Adjust the stocking rate and/or duration of the grazing season in response to available forage or changing range conditions. A 25-35% utilization threshold will be used when calculating appropriate stocking rates in most instances. During years of abundant or minimal forage, stocking rates and AUMs could be adjusted to match forage and overall range conditions up to the maximum preferred AUMs.

Examples of resource concerns these adjustments can address include reduced forage production, native plant composition, erosion in riparian areas, and stubble height for wildlife forage and cover.

ATTACHMENT C: DETERMINATION OF NO IMPAIRMENT

Compliance with NPS Management Policies Unacceptable Impact and Non-Impairment Standard

The National Park Service (NPS) Organic Act of 1916 directs the NPS to "conserve the scenery, natural, and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 USC 100101). Guidance for Non-Impairment Determinations and the NPS NEPA Process (April 2025) provides guidance for completing non-impairment determinations for NPS actions requiring preparation of an environmental assessment (EA) or environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA). The NPS has completed a determination of no impairment analysis for the Grazing Management Plan Environment Assessment for Black Canyon of the Gunnison National Park and Curecanti National Recreation Area (EA) and determined that it will not result in impairment of park resources, or in unacceptable impacts as described in § 1.4.7.1 of the 2006 NPS Management Policies.

NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

"While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them."

An action constitutes impairment when its impacts "harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values" (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

NPS non-impairment analysis normally does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, park operations, wilderness, etc., as these do not constitute impacts to park resources and values subject to the non-impairment standard under the Organic Act. See Management Policies § 1.4.6.

Determination of No Impairment for the Grazing Management Plan/Environmental Assessment for Black Canyon of the Gunnison and Curecanti National Recreation Area.

As a basis for evaluating the potential for impairment on the park units' resources, the NPS relied on the EA and Section 7 ESA documentation. The EA includes analysis of impacts to wildlife and special status species; vegetation, soils, wilderness, socioeconomics, livestock grazing, and water resources. Some resource impacts, such as recreation/visitor experience, were dismissed from detailed analysis in the EA. Please refer to Appendix C of the EA and Attachment B of the FONSI (Errata) for a discussion of impact topics considered but dismissed from detailed analysis. Those resources are not evaluated in this document because impacts to those resources are so small that they cannot result in impairment and do not warrant additional discussion here. Also, consistent with NPS guidance described above, the NPS has not included a non-impairment determination here for wilderness, socioeconomics, and livestock grazing. Livestock grazing is an activity that occurs within the parks, but is not a resource itself that is subject to the non-impairment standard in Management Policies § 1.4.6.

The EA evaluated two action alternatives for grazing in the park units. Those alternatives include the selected alternative and Alternative C. The selected alternative, Alternative B, is described in detail in the FONSI. The project area encompasses the entirety of the park units, which are located in southwestern Colorado between Gunnison and Montrose. Excluding Blue Mesa Reservoir, the park units have a total surface area of 62,880 acres, of which approximately 28 percent (17,480 acres) are grazing allotments. The Black Canyon of the Gunnison Wilderness in the northwest corner of the project area is approximately 15,600 acres and overlaps with 1 allotment in BLCA (EA, page 3). As disclosed in the EA, the selected alternative would result in overall beneficial impacts to all park resources, including the fundamental resources and values described below compared to current conditions. These changes will result in measurable beneficial effects to park resources compared to current conditions since grazing will be managed to meet desired conditions.

The purposes of BLCA, along with park significance statements and a description of the park's fundamental resources and values, are described in the Foundation Document, Black Canyon of the Gunnison National Park, (NPS 2013b). The park's purpose is:

“Black Canyon of the Gunnison National Park preserves an area encompassing spectacular gorges, the Gunnison River, and breathtaking landscapes by protecting its natural, cultural, and wilderness integrity for public benefit, inspiration, and enjoyment.”

Fundamental Resources for BLCA that are impacted by the selected alternative include native plant and wildlife communities. As noted in the BLCA Foundation Document, these resources include upland habitats and riparian wetlands with diverse plant and wildlife communities. (NPS 2013b, Page 7). Also, the park is significant for its protection of upland environments that encompass sensitive species including the Gunnison Sage-grouse. (NPS 2013b, Page 6). Some fundamental resources and values will not be impacted by the selected alternative, or the impacts will be so small that they did not warrant a more detailed analysis here. Those include the canyon itself, recreation, the Gunnison River, and the spectacular views of the gorge.

The purposes of CURE, along with park significance statements and a description of the park's fundamental resources and values, are described in the Foundation Document, Curecanti National Recreation Area, (NPS 2013a). The park's purpose is:

“Curecanti National Recreation Area protects an abundance of natural, historic, and archeological features in a western landscape encompassing canyons, pinnacles, cliffs, rivers, reservoirs, and mesas, while offering opportunities for recreation, public benefit, and personal reflection.”

The park's significance statement and fundamental resources and values highlight resources and values that may be impacted by grazing which include aquatic resources and riparian plant and animal communities. The CURE Foundation Document notes the park includes exceptional water quality and a diverse assemblage of plants and wildlife, including sensitive species. (NPS 2013a, Page 7). Some fundamental resources and values will not be impacted by the selected alternative, or the impacts will be so small that they did not warrant a more detailed analysis here. Those include archeology, geology and paleontology, recreation, and scenic views.

Wildlife and Special Status Species

The selected alternative is likely to improve habitat conditions for wildlife and special status species over the long term. Potential impacts to wildlife, special status species, including federally-listed wildlife and designated critical habitat, under the selected alternative could occur through ongoing livestock grazing and rangeland infrastructure activities. For example, continued livestock grazing and trailing could result in shifting plant composition and decline in native grasses which could impact habitat for general wildlife and special status species like GUSG. Also, there may be short-term adverse impacts on wildlife and special status species habitat from removal or installation of range improvements, such as fencing or water developments. Ongoing impacts on wildlife and special status species from livestock grazing and trailing would continue to some extent, as there will still be livestock in species habitats in the project area during certain times of the year. However, these impacts would be reduced by management actions under the selected alternative and would not rise to the level of unacceptable or impairment.

Over the long term, improvements to rangeland will enhance wildlife habitat communities through robust monitoring and adaptive management strategies. For species of concern such as the GUSG, the selected alternative includes habitat protections that restrict grazing and trailing activities during sensitive life stages (lekking, nesting, and brooding), covering key brooding areas and approximately 10,230 acres of designated critical habitat. These actions, combined with potential adjustments to season of use and grazing intensity, are expected to enhance both the quality and connectivity of occupied and unoccupied GUSG habitat.

Infrastructure improvements such as wildlife-friendly fence designs, improved water development placement, and wildlife escape ramps will further reduce negative impacts on wildlife species, particularly in riparian areas. Domestic sheep grazing will be removed where necessary to reduce contact with bighorn sheep, limit the risk of disease transmission, and support long-term herd viability.

The selected alternative may affect, but is not likely to adversely affect, federally listed species including gray wolf, GUSG, monarch butterfly, and Suckley's cuckoo bumble bee. These effects are expected to be insignificant or discountable, and consistent with Section 7 consultation findings under the Endangered Species Act. There will be no effect to yellow-billed cuckoo, Mexican spotted owl, or Canada lynx due to lack of occurrence in the project area or habitat overlap. The USFWS concurred with these findings in their August 8, 2025 memo to the NPS.

Through adaptive management of livestock grazing and implementation of conservation measures, the selected alternative will result in long-term benefits to wildlife and special status species and their habitats when compared to existing conditions. Although there would be short-term impacts to wildlife and special status species during installation or removal of range improvements, wildlife and special status species and their habitats will benefit over the long term and will be present for the enjoyment of future generations. The eventual removal of grazing in BLCA under the selected alternative will also remove the environmental stressors associated with livestock grazing operations. Because the selected alternative improves habitat conditions and provides for the perpetuation of species in the parks, the selected alternative does not destroy or diminish the integrity of wildlife and special status species in the park units

and thus does not result in impairment or unacceptable impacts to wildlife and special status species within the park units.

Vegetation

Situated along the Gunnison River and home to some of the steepest cliffs in North America, the park units have a variety of riparian and upland vegetation communities. Impacts to vegetation resources from the selected alternative may occur as a result of localized trampling and grazing from livestock and administrative activities associated with livestock grazing operations. Indirect impacts on vegetation communities, such as shifting of the overall composition of communities could be influenced by livestock grazing and trailing. Additionally, livestock grazing and grazing operations could lead to increased potential for introduction of noxious or invasive weeds. These impacts would only occur during grazing and trailing operations and would be restricted to existing grazing allotments.

Under the selected alternative, NPS will require grazing permittees to meet or make substantial progress towards meeting desired conditions for each allotment. Because NPS will respond adaptively to conditions through long-term monitoring, the selected alternative would result in overall long-term beneficial impacts on native vegetation communities in the project area, when compared to existing conditions. Also, as grazing eventually ends in BLCA, livestock impacts to vegetation in BLCA would cease.

In conclusion, while ongoing grazing continues to impact vegetation communities, these effects will not result in unacceptable impacts nor impair vegetation communities within the park units. The selected alternative will enhance vegetation conditions through active monitoring and mitigation as described in the FONSI. By addressing adverse impacts from grazing, the selected alternative will ensure that any adverse impacts from grazing do not compromise the integrity of vegetation communities within the park units.

Soils

Under the selected alternative, impacts on soil stability and quality may occur from livestock grazing, trailing, and construction or maintenance of rangeland improvements. These impacts include compaction, displacement of organic matter, and disturbance of biological soil crusts, particularly in riparian areas and on soils rated as highly susceptible to compaction or erosion. However, the selected alternative incorporates adaptive management strategies, such as seasonal grazing restrictions, exclusionary fencing, and terms and conditions within SUPs that are designed to reduce the intensity, duration, and spatial extent of these impacts. Short-term soil disturbance may occur during the construction or removal of range improvements or fencing, but these impacts would be localized and temporary.

Over the long term, improved grazing management and reduced use in sensitive areas such as riparian zones are expected to result in enhanced soil stability, reduced erosion potential, and increased vegetation cover. Also, as grazing eventually ends in BLCA, any grazing and trailing impacts to soils in BLCA would cease. The selected alternative supports soil resource protection through data-informed monitoring and adaptive management and thus the selected alternative will not result in significant impacts or impairment to soil resources within the park units.

In conclusion, while ongoing grazing and trailing continues to affect soils, these impacts will not rise to the level of unacceptable impacts nor impair the soils within the park units. The selected alternative will improve soil conditions by reducing the intensity, duration, and spatial impacts of grazing activities on

sensitive soils. This approach avoids severe localized impacts and includes measures to mitigate effects when identified, ensuring the integrity of these soils remains intact. Consequently, soils will be preserved for future enjoyment and the soils unimpaired.

Water Resources

The selected alternative includes targeted measures to protect and improve riparian areas and water quality within the park units. Under this alternative, concentrated livestock use and direct access to water sources, would be restricted or eliminated from riparian areas and wet meadows. These actions are expected to improve the proper functioning condition of riparian systems by reducing nutrient and animal waste input, minimizing streambank disturbance, and preventing erosion. However, some impacts to water resources in the project area will continue especially in the short term as the park initiates the programmatic monitoring plan and identifies allotment-specific riparian areas where livestock will be removed. Also, livestock will remain on the landscape in CURE and animal waste and erosion from grazing and trailing activities will continue to some extent. Ongoing livestock grazing activities would therefore continue to contribute adverse effects to water resources in specific areas where grazing continues in proximity to riparian features.

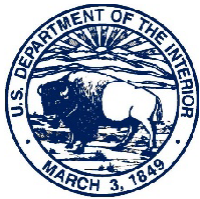
Livestock exclusion from sensitive hydrologic features, particularly in allotments with substantial riparian acreage such as Iola and Sapinero Mesa, would result in direct long-term benefits to water resources. In addition, riparian restoration actions within the selected alternative will target erosion features to further improve hydrologic function and resilience to drought. While livestock operators may need to adjust water access strategies, these measures are designed to ensure continued livestock operations while protecting water-dependent resources. Also, as grazing eventually ends in BLCA, livestock impacts to water resources in BLCA would cease.

In conclusion, while ongoing grazing will continue to slightly diminish water quality and the health and function of riparian areas in some locations, the selected alternative will not rise to the level of unacceptable impacts nor impair water resources within the park units. The selected alternative will enhance water resources compared to current conditions as described above. By enhancing the function of riparian areas and improving water quality, the selected alternative will ensure the integrity of these resources remains intact. Riparian areas, a fundamental resource of the park, will be preserved for future enjoyment, ensuring that any adverse impacts from grazing does not compromise the integrity of these areas nor compromise the water quality within the park units.

Conclusion

This analysis was guided by best available science, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities. The NPS has determined that implementation of the selected alternative will not constitute impairment of the resources or values of Black Canyon of the Gunnison National Park nor Curecanti National Recreation Area. This conclusion is based on consideration of the park units' purposes and significances, fundamental resources and values, a thorough analysis of the environmental impacts described in the EA, comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies 2006*.

ATTACHMENT D: USFWS CONCURRENCE MEMO



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Colorado Ecological Services Field Office Western Team
445 W. Gunnison Ave, Suite 240
Grand Junction, Colorado 81501

In Reply Refer to:
FWS/R6/ES-COFO/Ecosphere 2025-0130149

Memorandum

To: Superintendent, Black Canyon of the Gunnison National Park and
Curecanti National Recreation Area, National Park Service, Gunnison, Colorado

From: Western Colorado Supervisor, Colorado Field Office,
U.S. Fish and Wildlife Service, Grand Junction, Colorado

Subject: ESA Section 7 Consultation for Grazing Management Plan
(Ecosphere Project Code 2025-0130149)

**NATHAN
DARNAL** Digitally signed by
NATHAN DARNALL
Date: 2025.08.08
15:58:42 -0600

This memo responds to your July 8, 2025, request for an informal consultation with the U.S. Fish and Wildlife Service (Service), pursuant to Section 7 of the Endangered Species Act of 1973, as amended (ESA, 16 U.S.C 1531 et seq.), including your Environmental Assessment (EA) which we adopt as the biological assessment for this consultation. Your request is for the Grazing Management Plan (GrMP; Project) for Black Canyon of the Gunnison National Park (BLCA) and Curecanti National Recreation Area (CURE) (the “park units”) of the National Park Service (NPS), located along the Gunnison River in Gunnison, Montrose, and Delta Counties of Colorado.

The NPS has determined that the proposed Project may affect, but is not likely to adversely affect (NLAA) the following species: the proposed threatened monarch butterfly (*Danaus plexippus*; monarch), the proposed endangered Suckley’s cuckoo bumble bee (*Bombus suckleyi*; Suckley’s), the threatened, non-essential experimental population (NEP) of gray wolf (*Canis lupus*; wolf), the threatened Gunnison sage-grouse (*Centrocercus minimus*; GUSG) and the critical habitat (CH) of GUSG. The Service concurs with your determinations for these effects to the aforementioned species and CH potentially caused by the proposed action. Our rationale follows in detail per species.

You also determined that the proposed action would have no effect on the threatened Canada lynx (*Lynx canadensis*), the Mexican spotted owl (*Strix occidentalis lucida*), and the yellow-billed cuckoo (*Coccyzus americanus*). While the ESA does not require the Service to concur with no effect determinations, we appreciate receiving the information used to support your determinations. These species will not be addressed any further.

The NPS proposes “Alternative B – Adaptive Grazing Management” (see EA) as their preferred alternative being the proposed Project (aka proposed action). Therefore, this memo responds to Alternative B only. The EA states that the proposed Project is “to provide a long-term plan that ensures that livestock grazing is consistent with relevant laws, regulations, interagency agreements, and policies” within the boundary of the park units, combined for a total surface area (SA) of 72,940 acres (ac.); excluding Blue Mesa Reservoir for land SA is 62,880 ac. The proposed action is to permit and manage livestock grazing and trailing specifically within 26 grazing allotments that encompass 17,480 acres (approximately 28%) within both park units (aka

action area). Within the total allotment acreage, 11,388.5 ac. (approximately 65%) occurs in federally designated CH of the GUGS. The total permitted Animal Unit Months (AUMs) across shared allotments are likely to remain the same over the short term. Over the long term, AUMs and terms and conditions, including livestock kind in the case of domestic sheep, may be adjusted through Federal agency decision process, or a combination of decisions made through consultation. Where domestic sheep grazing occurs, NPS will use the Western Association of Fish and Wildlife Agencies' "Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat" (WAFWA 2025), which is considered the best available science and practice. Currently, four allotments (10,655 ac.) will be grazed by domestic sheep (44.1% of total grazing allotment acreage; see Table 2-1 of EA). Using adaptive grazing management to guide authorization and administration of livestock grazing and trailing in the action area, the park units will use monitoring, mitigation measures, and grazing prescriptions to reduce impacts on natural, cultural, and visitor experiences. Furthermore, NPS will require permittees to meet or make substantial progress towards meeting desired conditions outlined within allotment-specific, short- and long-term monitoring plans (see EA).

The communication timeline for interagency cooperation began May 2, 2024, resulting in a signed Memorandum of Understanding (MOU) dated September 22, 2024. We were given access to the first internal draft environmental assessment (EA) on April 2, 2025, followed by comments and feedback. The second draft EA was shared on May 5th, in which we met to discuss and provide feedback in July 2025 as well. The Service received the revised final EA as the biological assessment (referred to as EA) with NPS's formal initiation request letter for section 7 consultation on July 8, 2025.

For important background context, "in the past, the Bureau of Land Management (BLM) permitted and managed grazing on NPS-administered lands in both park units, and the U.S. Forest Service (USFS) has permitted and managed grazing on NPS-administered lands in CURE. NPS is currently managing grazing in BLCA through special use permits (SUPs), while BLM and USFS are currently administering grazing on NPS-administered lands in CURE. Current management will continue until this GrMP and EA is complete, when NPS will issue livestock grazing and trailing SUPs for lands under NPS management in both CURE and BLCA" (refer to the EA).

The monarch butterfly (*Danaus plexippus*; monarch) was proposed for listing as a federally threatened species under the ESA on December 12, 2024 (89 FR 100662). While there is suitable habitat in the park units, monarchs have not been documented in the proposed action area. The NPS made a may affect, but is not likely to adversely affect (NLAA) determination for the proposed action on the monarch. Because of a) lacking suitable habitat, and b) neither adults nor caterpillars have been documented in the park units, we concur the proposed action is not likely to adversely affect the monarch butterfly or jeopardize the continued existence of the species.

Conservation recommendations are suggestions of the Service regarding discretionary measures to minimize or avoid adverse effects of a proposed action on listed species or critical habitat or regarding the development of information (50 CFR 402.02). As conservation recommendations, we suggest incorporating [wildlife-friendly practices to benefit pollinators](#), such as the monarch, that may be affected by Project activities. If monarchs or milkweed are observed, please report the observations to a monarch citizen science project, such as the Integrated Monarch Monitoring

Program through the [Monarch Joint Venture](#). This information will assist in understanding where monarchs go when they depart their overwintering grounds.

The Suckley's cuckoo bumble bee (*Bombus suckleyi*; Suckley's) was proposed for listing as a federally endangered species under the ESA on December 17, 2024 (89 FR 102074). Based on the best available information, no Suckley's have been observed in Colorado since 2014 despite ongoing statewide surveys. Therefore, we concur with the not likely to adversely affect determination based on lack of occurrence in the Project area.

As a conservation recommendation, we recommend restoring disturbed areas with local seed mixes with a diversity of nectar plants (<http://www.xerces.org/monarch-nectar-plants/>).

In Colorado, the gray wolf was designated as a nonessential experimental population (NEP) under the section 10(j) of the ESA on November 11, 2023 (88 FR 77014). For purposes of section 7 consultation, NEPs are treated as a proposed species, except on National Park Service lands and National Wildlife Refuge lands where they are treated as threatened (50 CFR 17.83). While it is reasonable to expect wolves to move near and through the park units in coming years as the reintroduced population continues to expand, the NPS anticipates wolves will follow big game into higher elevations (outside of the park units). Given the expected seasonal movement patterns, grazing locations, and limited potential for conflict within park units, any effects are anticipated to be discountable. We concur with the determination that the action is not likely to adversely affect the NEP of the gray wolf in Colorado.

You have requested concurrence with your determination that the proposed Project may affect but is not likely to adversely affect (NLAA) the federally threatened GUSG (*Centrocercus minimus*; GUSG) and their designated critical habitat (CH). We concur with your determinations; our rationale is provided in detail below.

Based on both the GUSG Recovery Plan (RP; Service 2020) and the EA for the GrMP posted July 2025, justifications can be made that well-managed grazing does not harm GUSG and their CH and can be compatible with conservation when guided by best practices. The GrMP integrates conservation strategies for GUSG, aligning with the RP. Both documents promote best practices to mitigate risk with the following shared conservation and management actions, including modifying grazing intensity, rotation, timing, and distribution to protect key habitats; restoration of habitat (i.e. riparian and wet meadow improvements); infrastructure changes to reduce mortality and fragmentation (i.e. fence removal or marking); and adaptive management with ongoing monitoring to respond to habitat conditions. These management features directly support the GUSG Recovery Implementation Strategy (RIS) Priority 2 actions and activities under number 6, which is dedicated to the effects of grazing, including activities 6.01, 6.02, 6.03, 6.05, 6.06, 6.06 as well as 3.01, 3.15 (Service 2020).

Gunnison Sage-grouse Conservation Measures Summary

- Timing Restrictions
Timing restrictions minimize disturbance during critical life stages—mating, nesting, and brood-rearing (March 15–July 15)—to protect reproductive success and enhance chick survival. As noted in the EA, grazing under the proposed plan is not likely to adversely

affect GUSG due to these restrictions. This measure supports Priority 2 actions in the GUSG Recovery Implementation Strategy (RIS), including activities 3.01, 8.03, 8.04, 8.05, and 8.07 (Service 2020).

- Deferred and Rotational Grazing
Using best available science, deferred and rotational grazing enhances vegetation structure, protects sensitive habitats during key life stages, and promotes habitat regeneration. These practices reduce the impacts of continuous grazing and support long-term sagebrush ecosystem health—essential to GUSG survival. This supports RIS Priority 6, activity 6.03, and CH Primary Constituent Element (PCE) 1 at the landscape-scale.
- Infrastructure Modification or Removal
Altering or removing infrastructure reduces collision risk, restores habitat connectivity, limits predator and human disturbance, and enhances brood-rearing and nesting habitats. This action supports RIS conservation goals and overall habitat integrity. This supports RIS Priority 2 action, number 6 activities.
- Wet Meadow Restoration
Restoring wet meadows improves chick foraging habitat, increases brood survival, and enhances habitat diversity and landscape resilience. This supports CH PCE 5 (alternative mesic habitats).
- Monitoring
Monitoring provides essential data for adaptive management, evaluates habitat conditions, and measures conservation outcomes. This ensures the long-term effectiveness of recovery strategies and supports the RIS Priority 3-10 actions and activities; CH PCEs 1, 3, and 5, depending on habitat type monitored).
- Other Habitat Improvement Initiatives:
Habitat enhancements within grazing allotments will prioritize:
 - Vegetative Restoration: Includes native seeding, live plantings, wet meadow and gully restoration, and extended rest from grazing in treated areas. Supports RIS Priority 1 actions and activities 1.03, 1.05, 1.07, 2.06, and 5.04.
 - Vegetation Treatments: Targets improvement of sagebrush habitat using herbicides, mechanical/manual removal of invasive species—especially cheatgrass (*Bromus tectorum*). Supports RIS Priority 2 actions and activities 2.03, 2.04, and 2.05.

The Recovery Plan for the GUSG acknowledges that grazing is not inherently detrimental to GUSG (2020). Negative impacts would stem from improperly managed grazing, such as excessive intensity or poor timing. When managed adaptively, grazing can maintain or improve habitat conditions, supporting the structure and composition of vegetation necessary for GUSG nesting and brood-rearing. Because the proposed action explicitly addresses these aspects, adverse effects to GUSG and CH will be avoided, and therefore, we concur with the park units' NLAA determination.

As a conservation recommendation, we request NPS to enter their GUSG restoration efforts into the collaborative [Conservation Efforts Database](#) (CED), GUSG Module. This measure directly supports Priority 3 actions and activities for the recovery of the GUSG and necessary habitat features described in the GUSG RIS (Service 2020).

This concludes section 7 consultation. Reinitiation of consultation is required and shall be requested by the Federal agency, where discretionary Federal involvement or control over the action has been retained or is authorized by law and;

- 1) if the amount or extent of taking specified in the incidental take statement is exceeded;
- 2) if new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered;
- 3) if the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in the biological opinion or written concurrence; or
- 4) if a new species is listed or critical habitat designated that may be affected by the identified action (50 CFR 4012.16(a)).

We appreciate your efforts to collaborate with us and to ensure the conservation of threatened and endangered species. If you have any questions or comments, please contact Angela Trnka, wildlife biologist, at angela_trnka@fws.gov or (970) 238-7435. Thank you.

cc: Doug Wetmore, NPS Project Manager, BLCA-CURE
Brinnen Carter, NPS Manager of Resources, BLCA-CURE
Aleshia Rummel, NPS Environmental Protection Specialist, BLCA-CURE

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