

January 15, 2016

Neil Kornze
BLM Director
1849 C Street NW (WO-200)
Washington, D.C. 20240

Dear Director Kornze,

The undersigned conservation groups wish to thank the Bureau of Land Management for this opportunity to comment in support of the proposed mineral withdrawal to conserve habitat for the Greater Sage-Grouse. This comment applies to both the proposed withdrawal application, and scoping for the Draft Environmental Impact Statement (EIS).

While the proposed 10 million acre hard rock mineral withdrawal in Sagebrush Focal Areas (SFAs) is significant, best available science indicates that all priority areas for Greater Sage-Grouse conservation (PACs), approximately 35 million acres of federal lands, should be protected from all forms of mining to ensure grouse survival and recovery.

For example, the [National Technical Team](#) recommendation for priority habitat is the “withdrawal from mineral entry based on risk to the sage-grouse and its habitat from conflicting locatable mineral potential and development.” And to “make any existing claims within the withdrawal area subject to validity patent exams or buy out.”

Further, in a [March 12 letter](#) from grouse conservation scientists to Secretaries Jewell and Vilsack, the importance of this recommendation was reiterated, stating, “Closing and recommending for immediate withdrawal lands from leasing or sale (including coal) under federal mineral laws for the maximum period allowed under law.”

The proposed 10 million acre withdrawal falls far short of the NTT recommendation to protect priority habitat, and does not include the validity exams or buyouts for existing rights. It does not withdraw all Wyoming SFAs and the Lander, Miles City, and Northwest Colorado Resource Management Plans which did not establish SFAs are wrongly excluded from the proposed withdrawal, as is priority habitat for the Bi State distinct population segment.

We therefore urge that the withdrawal application be revised to include all Greater Sage-Grouse PACs and also apply to locatable, salable and leasable minerals, and that the draft EIS include an alternative which analyzes the environmental benefits of mineral withdrawal from all PACs.

Thank you for considering this comment. We would be interested in meeting with you to further discuss this request.

Sincerely,

American Bird Conservancy
Advocacy Coalition of Telluride
Alberta Wilderness Association
Ancient Forest International

Arizona Native Plant Society
Arkansas Valley Audubon Society
Audubon Arkansas
Audubon Society of Corvallis, Oregon
Audubon Society of Kalamazoo
Bird Conservation Network
Bird Watcher's Digest
Black Canyon Audubon Society
Black River Audubon Society
Bozeman Birders
Bridgerland Audubon Society
Californians for Western Wilderness
Canton Audubon Society
Chicago Audubon Society
Concerned Citizens of Big Bay
Council for Environmental Education
Craighead Institute
Eastern Long Island Audubon Society
ECOAN
EcoTours of Oregon Day Tours
Endangered Habitats League
Endangered Species Coalition
Environmental Protection Information Center (EPIC)
Foothills Audubon Club
Fort Collins Audubon Society
Foundation for Deep Ecology
Frontenac Stewardship Foundation
Genesee Valley Audubon Society
Golden Eagle Audubon Society
Greater Ozarks Audubon Society
High Country Audubon Society
Illinois Ornithological Society
Information Network for Responsible Mining
Iowa Audubon
Jayhawk Audubon Society
Kerncrest Audubon Society
Kettle Range Conservation Group
Klamath Forest Alliance
Lahontan Audubon Society, Reno, Nevada
Lane County Audubon Society
Laramie Audubon Society
Maryland Ornithological Society
Minnesota River Valley Audubon Society
Montana Environmental Information Center
North American Grouse Partnership
Pacific Biodiversity Institute
Peregrine Audubon Society
Plumas Audubon Society

Prescott Audubon Society
Prince George's Audubon Society
Quad City Audubon Society
Roaring Fork Audubon Society
Rocky Mountain Wild
Saint Louis Audubon Society
Salem Audubon Society
Sangre de Cristo Audubon Society
Santa Barbara Audubon Society
Sarasota Audubon Society
Saving Birds Thru Habitat
Saving Paradise
Sierra Foothills Audubon Society
Soda Mountain Wilderness Council
The Clinch Coalition
The Tennessee Ornithological Society
The Urban Wildlands Group
Umpqua Watersheds, Inc.
Victor Emanuel Nature Tours Inc.
Weminuche Audubon Society
West Virginia Highlands Conservancy
Western Watersheds Project
Western Nebraska Resources Council
Wild Utah Project
Wildlands Network
World Temperate Rainforest Network
Yellowstone to Uintas Connection
Yosemite Area Audubon Society