

Advocates for the West ✦ American Bird Conservancy ✦ Animal Welfare Institute
Boulder County Audubon Society ✦ Center for Biological Diversity
Cornell Lab of Ornithology ✦ Endangered Species Coalition ✦ Earthjustice
Grand Canyon Trust ✦ Great Old Broads for Wilderness ✦ Montana Wilderness Association
Nevada Conservation League ✦ New Mexico Sportsmen ✦ North Dakota Birding Society
Oregon Natural Desert Association ✦ Prairie Hills Audubon Society ✦ Rocky Mountain Wild
Sierra Club ✦ Western Watersheds Project ✦ Wild Utah Project ✦ WildEarth Guardians
Wyoming Wilderness Association

September 25, 2017

The Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
Washington, D.C. 20240

Dear Secretary Zinke,

On behalf of the undersigned conservation groups, we urge the administration to rigorously implement the existing federal Greater Sage-Grouse conservation plans and to abandon efforts to alter or undermine these plans through administrative changes of policy or implementation, or by proposing resource management plan amendments. Collectively, the proposed recommendations in the Sage Grouse Report would undermine grouse conservation by reducing the effective and durable measures necessary to prevent the species from becoming endangered.

In our view, the Report is tailored to support efforts to carve out additional uses that damage or degrade sagebrush habitat, and to tip the balance away from conservation toward development. In short, it amounts to a recipe for continued habitat loss that will make listing of the Greater Sage-Grouse under the Endangered Species Act (ESA) necessary.

The changes proposed in the Report would undermine the range-wide conservation strategy that amended 98 Resource Management Plans and Forest Plans and that U.S. Fish and Wildlife Service deemed adequate for the conservation of the grouse. Other essential elements of the strategy would also be weakened, including mitigation and adaptive management measures needed to ensure the plans are being effective.

Ineffective conservation measures: We are concerned that the Report proposes management approaches that are wholly inappropriate and ineffective for sage grouse. These include captive breeding, predator control, and relying on population targets as an alternative to habitat protections. As the document notes, captive breeding has not been proven effective, can be predicted based on past experience with Northern and Masked Bobwhite to be ineffective in restoring sage grouse, and may require removal of eggs from the wild, which may negatively impact wild populations. It also poses an unacceptable risk of introducing disease to wild birds.

Predator control is controversial, can kill non-target species, can disrupt the natural balance of different predator species resulting in increased predation on sage grouse, and is not an effective substitute for habitat conservation or ensuring sustainable levels of use of sagebrush

habitats. Population objectives are not an adequate measure of grouse conservation due to the species' dependence on intact sagebrush habitat and its rapid and cyclical flux in population numbers.

Reduction of Focal Areas and Priority Habitat: The Report recommends the potential elimination of designated Sagebrush Focal Areas, and the added habitat protections they provide. But the Focal Areas are the lands most essential to ensure sufficient and durable habitat conservation. In fact, based on the best available science, it can be argued that a much larger system of sagebrush reserves, with even more stringent protections are needed to ensure effective and durable habitat conservation for the grouse.

We are adamantly opposed to the notion of increasing oil and gas drilling within Focal Areas and Priority Sage Grouse Habitat in the short-term by altering stipulations, and providing additional waivers and exceptions, and in the long-term through plan amendments to eliminate Focal Areas. We also oppose reversing current direction to prioritize leasing away from priority habitat and reducing the size of lek buffers from drilling projects.

The report also proposes reprioritizing grazing permit renewals to focus only on "problem areas" rather than in Sagebrush Focal Areas and Priority Habitat as called for now. By reprioritizing, the BLM is setting back the clock on the implementation promised two years ago and undermining the efforts of all of the states in developing prioritization lists based on habitat importance.

Lack of mitigation and adaptive measures: We and other science-based groups remain concerned that the existing plans, even if fully implemented, may not be sufficient to conserve grouse populations. Mitigation and adaptive measures are essential safeguards that now appear to also be threatened with revisions. The "net conservation gain" standard and requirements for compensation recognize that to conserve grouse will require fully mitigating further habitat losses.

The adaptive management requirements in the plans backstop the grouse conservation effort, by automatically updating the plans to address habitat loss and population declines when thresholds are exceeded. A plan amendment to remove automatic hard trigger responses raise concern that some threats contributing to habitat loss and population declines would not be addressed.

Thank you for considering these comments on the Sage Grouse Report. We urge that efforts to weaken or undermine the existing grouse conservation plans be abandoned, and that the administration instead pursue a course to fully implement the sagebrush conservation measures already in place to stabilize and eventually recover the Greater Sage-Grouse.

Sincerely,

Advocates for the West
Alberta Wilderness Association
American Bird Conservancy
Animal Welfare Institute
Audubon Naturalist Society
Audubon Society of Kalamazoo
Bird Conservation Network
Black Swamp Bird Observatory

Bold Alliance
Boulder County Audubon Society
Bozeman Birders
Californians for Western Wilderness
Center for Biological Diversity
Chesapeake Bay Sierra Club
Chesapeake Wildlife Heritage
Chicago Audubon Society
Coeur d'Alene Audubon Society
Columbia Land Trust
Conejo Valley Audubon Society
Conscious Talk Radio
Cornell Lab of Ornithology
Delmarva Ornithological Society
Earthjustice
Eastern Long Island Audubon Society
ECOAN
Endangered Habitats League
Endangered Species Coalition
Environmental Protection Information Center
Friends of the San Pedro River
Grand Canyon Trust
Grand Valley Audubon Society
Great Old Broads for Wilderness
Greater Hells Canyon Council
Kalmiopsis Audubon Society
Kettle Range Conservation Group
Klamath Forest Alliance
Lane County Audubon Society
Los Angeles Audubon Society
Maricopa Audubon Society
Maryland Ornithological Society
Michigan Audubon
Minnesota River Valley Audubon Chapter
Missouri River Bird Observatory
Montana Wilderness Association
Napa Climate NOW!
Nevada Conservation League
New Mexico Sportsmen
North Dakota Birding Society
NY4Whales/NY4Wildlife
Old Hemlock Bird Observatory
Olympic Vulture Study
Oregon Natural Desert Association
Otter Creek Audubon Society
Ozark Nature
Port Crescent Hawk Watch
Prairie Hills Audubon Society

Prince George's County Audubon Society
Quad City Audubon Society
Rainier Audubon Society
Rogue Valley Audubon
Roanoke Valley Bird Club
Rockbridge Bird Club
Rocky Mountain Wild
Saint Louis Audubon
Salem Audubon Society
San Bernardino Valley Audubon Society
Save Our Sky Blue Waters
Saving Birds Thru Habitat
Sequoia ForestKeeper
Sierra Club
Sierra Foothills Audubon Society
Soda Mountain Wilderness Council
South Lake Simcoe Naturalists
Southern Maryland Audubon Society
Tampa Audubon Society
Texas Biodiversity Action Group
The Lands Council
The Urban Wildlands Group
Tri-County Bird Club
Tucson Audubon Society
Turtle Island Restoration Network
Virginia Society of Ornithology
Wasatch Audubon Society
Western Nebraska Resources Council
Western Watersheds Project
Wild Utah Project
WildEarth Guardians
Wildlife Conservation Advocacy Southwest
Wyoming Wilderness Association
Zoo Knoxville