April 6, 2020

A copy of the letter sent to the following State sage-grouse leads in the Bureau of Land Management:
Mr. Jonathan Beck; Idaho Sage-grouse Implementation Lead
Ms. Arlene Kosic; California Greater Sage-grouse Implementation Coordinator
Ms. Jenny Marzluf; Wyoming Greater Sage-grouse Coordinator
Mr. Jim Regan-Vienop; Oregon Planning and Environmental Coordinator
Ms. Carolyn Sherve; Nevada Greater Sage-grouse Implementation Coordinator
Ms. Leah Waldner; Colorado Sage-grouse Coordinator
Ms. Mellissa Wood; Utah Sage-grouse Plan Implementation Coordinator

Re: Comments on Greater sage-grouse Draft Supplemental Environmental Impact Statements

Dear BLM Greater Sage-grouse State Leads,

This letter expresses our concerns regarding how the Bureau of Land Management (BLM) is addressing conservation of greater sage-grouse (herein sage-grouse) and sagebrush habitats. The Department of Interior (DOI) appears to be ignoring current science, which threatens its federal trust responsibility to conserve and manage our natural resources and may have severe consequences for sage-grouse.

In response to a U.S. District Court decision last October, on February 11, 2020 the BLM published six Draft Supplemental Environmental Impact Statements (SEIS) in support of the 2019 sage-grouse Resource Management Plan (RMP) amendments in Idaho, Wyoming, Colorado, Utah, Oregon, and Nevada/northeastern California. While BLM issued its SEISs in response to a narrow scope of issues recognized in that District Court decision, the initiation of the SEIS processes presents the BLM an important opportunity to address significant new information concerning recent sage-grouse population declines and loss of sagebrush habitats.

Sage-grouse populations have been in decline since the 1960s. Average declines in populations across the range of the species are estimated at 2% per year from 1965 to 2015, a rate of decline suggesting a reduction in total average population size of 66% over that time period. These declines prompted several Endangered Species Act listing petitions and led to the development and implementation of state and federal management strategies that included targeted sage-grouse management actions. However, recent population trends suggest that rates of decline are continuing and may be increasing. Over the last 4 years (2015-2019), state-level data suggest sage-grouse populations have declined 44% on average. Numbers of sage-grouse in population strongholds [not just in periphery areas] are decreasing with estimated statewide declines of between 33 and 52% in Oregon, Idaho, Nevada, Montana, and Wyoming from 2015 to 2019. Projections are for sage-grouse populations to continue to decline given current trends in habitat loss and degradation.

Wildland fires are one of the most immediate and pervasive threats to sage-grouse, especially throughout western portions of the species' range. The threat to population and habitat persistence posed by the proliferation of invasive annual grasses and resulting increases in fire frequency, which ultimately results in long-term and often functionally permanent loss of fire-intolerant species such as sagebrush from the landscape, cannot be overstated. Data from the Great Basin Coordination Center suggest that fires on BLM lands are increasing. From 2016 to 2019, approximately 3 million acres of BLM lands burned in Idaho, Nevada and Utah alone, which was a 43% increase in annual BLM acres burned in these states compared to the previous 4-year period (2012-15). Over the next 20 years, median annual area burned is projected to increase by 5 to over 11 times in states supporting sage-grouse populations, suggesting that increasing trends in acres of BLM lands burned are likely to continue.

Sage-grouse population declines and habitat loss represent significant new environmental information that bears on the management actions established in the 2015 and 2019 sage-grouse RMP amendments. BLM must address these circumstances through supplements to the EISs used to inform those RMPs as prescribed in 40 CFR 1502.9(c)(1)(ii) of the National Environmental Policy Act (NEPA). Specifically, the regulations require agencies to:

> *"prepare supplements to either draft or final environmental impact statements if there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts."*

The Draft SEISs released February 11, 2020 do not reflect the reality of these new circumstances and provide no scientific justification for the majority of BLM management decisions given the current situation. Accordingly, BLM must expand the scope of these SEISs to address this new information and set of circumstances facing sage-grouse and sagebrush habitat.

Alignment of Federal and State Management Approaches
We agree in principle with the overall goal of 2019 efforts to align federal and state management approaches; coordination among those managing sage-grouse and sagebrush habitats is important for landscape-scale effect. However, effective coordination requires that each management body fulfills its distinct obligations in such a way that the overall goal is met as a product of the aggregate of actions. As such, the BLM should take into account two potential limitations to blanket alignment with state-level efforts: (1) the BLM should recognize and fulfil its unique role and trust responsibility in sage-grouse management; and (2) the BLM should establish that individual state plans are robust to ensure combined efforts across states are adequate to attain the goal of conserving sage-grouse across the range of the species.

Effective management of sage-grouse requires local, regional and range-wide perspectives. Consideration of range-wide population dynamics is a critical aspect of local and regional efforts addressed through federal engagement in sage-grouse conservation. By relying solely on state-level strategies and local project-level management of federal lands, the BLM is shirking its mandated responsibility of managing at broader scales. Narrowing the agency's focus will likely result in the ineffective management of landscapes essential for conserving sage-grouse populations.

State-level approaches to managing sage-grouse differ substantially across the range of the species. While some of these programs have been evaluated for effectiveness at statewide or smaller scales, other state plans are untested. Further, the potential collective effectiveness of these programs has not been examined, and the BLM provides no assessment of broad-scale applicability of these programs to meet the management goals the agency has established for itself. It is critical that the BLM evaluates the local programs it relies on and aligns only with programs that rigorously demonstrate that the conservation efforts collectively have a high probability of maintaining the long-term viability of sage-grouse populations across the range of the species.

Habitat Protection and Restoration
We also agree with BLM's recent emphasis on the need to manage wildfire in order to minimize future habitat loss for all sagebrush-dependent wildlife. However, effective protection and enhancement of the function, resistance and resilience of sagebrush habitats requires long-term dedication to science-based planning, implementation and monitoring, and strict adherence to adaptive management principles. We are concerned that recent planning efforts (e.g., the Record of Decision (ROD) associated with fuel breaks in the Great Basin signed March 27, 2020) do not reflect the complexity of the issue, and may do more harm than good. For example, BLM is expediting fuel breaks along roads and right-of-ways with little prioritization to select locations that are valuable to fire fighters, feasible to maintain, or appropriate for conditions of the surrounding landscape. This could result in accelerated loss, fragmentation, and degradation of intact sagebrush habitat without providing benefit to fire fighters. Soil disturbance associated with the construction

of fuel breaks can fragment what habitat remains and provide a conduit for the spread of invasive species. Failure to maintain treated areas and control invasive species long-term will almost certainly result in higher fuel loads leading to increased man and lightning-caused ignitions. Fuel breaks and other treatments can be part of a resource manager's tool box, but should be used in a limited, strategic manner that minimizes sagebrush loss and the spread of invasive species.

Science-based Decision Making

Data-driven, statistically-sound assessments of potential responses of sage-grouse populations and habitats to proposed management are necessary to ensure informed decision-making. Yet, the BLM in the 2020 Draft SEISs does not offer any substantive analysis of the indirect and cumulative impacts to sage-grouse of its management decisions. Given current circumstances, rigorous cumulative impact assessments are especially important because of BLM's reliance on the largely disjunct set of management approaches being implemented across the species' range (i.e., state-to-state coordination is limited). The BLM has failed to inform its decision making by not conducting rigorous impact analyses. This oversight will likely jeopardize the agency's ability to meet sage-grouse management goals.

The BLM needs to expand the scope of the Draft SEISs to address new circumstances described and substantiated with recent population and sagebrush habitat trends. Expansion of the scope provides an opportunity for the BLM to more rigorously analyze and assess the direct, indirect and cumulative impacts of management decisions on sage-grouse populations and habitats. Accomplishing such assessments is entirely feasible given the expertise, data, and analytical tools currently available to the BLM. The U.S. Geological Survey (USGS) in their synthesis of relevant literature published from 2015 to 2017 describe several decision-support tools that would apply directly to such analyses. The BLM itself has developed the Assessment, Inventory, and Monitoring (AIM) strategy and the Fire and Invasives Assessment Tool (FIAT) which are expressly meant to provide the agency with analytically-derived information for making impact and habitat management decisions. Further, in each of the 2015 Final EISs the BLM included a Greater Sage-grouse Monitoring Framework which established metrics and approaches for monitoring response of sage-grouse to management actions. The data and analytical tools established in this framework are also directly applicable to analyses we suggest.

Landscape-Scale Management

Because priority habitat management areas (PHMAs) are discrete areas located throughout the range of sage-grouse, large-scale conservation strategies being pursued by BLM depend not only on maintaining suitable habitats within each priority area, but also in large part on maintaining the range-wide connectivity of populations among these priority areas. The loss of connectivity among sage-grouse population strongholds due to human-related or naturally occurring disturbance is a strong predictor of long-term population declines. BLM has a critical role in managing connectivity and other broad-scale issues. Yet, the agency's recent push towards project-specific evaluations and the elimination of its avoidance options (e.g., prioritization of oil and gas leasing outside of important sage-grouse habitats has been discontinued in practice by BLM [Instructional Memorandum 2018-026]) suggest that the BLM has no viable landscape-scale approach to managing impacts to sage-grouse or its habitats. Furthermore, the BLM currently is not requiring compensatory mitigation and has deferred to state plans. While deference to state authority and mitigation programs may work, we remain skeptical as to not only compliance but also effectiveness for achieving a no-net-loss standard. In other words, the lack of a broad perspective on management, restoration and mitigation will likely lead to continued degradation and loss of sage-grouse habitats as development in these habitats proceeds. The SEISs offer no analyses related to mitigation or restoration, which represents a fatal flaw in BLM's analysis of new information and circumstances.

Conclusion

Long-term conservation of sage-grouse requires large, interconnected expanses of sagebrush habitats be managed for invasive annual grasses and other broad-scale factors. To succeed, these efforts need the

proactive participation of the Federal Government. Recent declines in numbers of sage-grouse coupled with long-term negative population trend, and increasing and continued loss of habitat establish the need for the BLM to reexamine the Final EISs relied upon to inform the 2015 and 2019 RMP amendments. It is imperative the scope of the current SEIS process be expanded to include robust examinations of multi-scaled assessments of sage-grouse population-level response to direct, indirect, and cumulative impacts associated with management alternatives. Informed decision-making requires scientifically-valid approaches to assessing these impacts that expressly take into account the uncertainty and risk inherent in sagebrush habitat management.

As scientists and sagebrush policy experts who have collectively spent over 630 years studying sage-grouse and sagebrush habitats, we have been intimately engaged in federal, state, and local efforts to manage and conserve sagebrush landscapes critical to this species. We, and the broader scientific community, remain committed to providing ongoing consultation about the science as well as how we can collectively move forward with a science-based approach to managing and conserving sage-grouse and sagebrush habitats on our federal public lands. Additional details relevant to the points we make in this letter can be found in letters we sent to the Secretary of Interior on October 13, 2017 and June 8, 2018.

NEPA mandates that BLM prepare SEISs to address the significant new circumstances and information the underscored sage-grouse and sagebrush experts present herein. The SEIS processes the BLM is currently engaged in must address these new circumstances and information. We look forward to participating in this process to ensure that agency decisions are robustly informed and incorporate the best available science following a preponderance of evidence approach to decision-making.

We appreciate your consideration of our comments,

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