THE WILDLIFE SOCIETY
5410 Grosvenor Lane • Bethesda, MD 20814-2144
Tel: (301) 897-9770 • Fax: (301) 530-2471
E-mail: tws@wildlife.org

February 7, 2012

The Wildlife Society (TWS) appreciates the opportunity to provide comments on the U.S. Forest Service/Bureau of Land Management Supplemental Environmental Impact Statement (EIS) to Incorporate Greater Sage-Grouse Conservation Measures into Land Use Plans and Land Management Plans. The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of over 11,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide.

Greater sage-grouse (*Centrocercus urophasianus*) are unique to the sagebrush steppe ecosystem in the western United States and Canada. Land use changes, as well as energy development, invasive plants, and altered fire regimes have resulted in long term loss of the sagebrush habitats which are essential to the species' survival. These factors have resulted in recorded range wide declines in greater sage-grouse numbers over the last five decades, increasing the probability of extinction. Sage-grouse are a landscape species that inhabit lands owned and managed by multiple jurisdictions. Thus, the preservation of large tracts of suitable habitat and the management of these areas to maintain connectivity between populations along with the ability to document the effects of collaborative actions on population trends are imperative.

In 2010, the greater sage-grouse was designated by the U.S. Fish and Wildlife Service (FWS) as a candidate species for listing under the Endangered Species Act (ESA, 75 FR 13910). However, a litigation settlement requires the FWS to revisit this decision by September, 2015. One of the main factors identified by the FWS in the 2010 designation decision was that contemporary regulatory mechanisms were inadequate to conserve the greater sage-grouse and its habitat across its range. This factor posed a significant threat to the species. Because the majority of greater sage-grouse habitat is under the management purview of BLM and FS, the agencies have proposed to incorporate consistent objectives and conservation measures for the protection of greater sage-grouse and its habitat into relevant RMPs and LMPs by September 2014. These actions are intended to address the FWS concerns and thus avert a potential listing of the species as threatened or endangered under the ESA. We commend the BLM and FS for taking such proactive actions, but contend that the end state of this process should be implementation of conservation measures for the protection of greater sage-grouse and its habitat in relevant RMPs and LMPs that *ensure the long-term viability of sage-grouse populations.* We argue that if the planning actions fully consider measures which ensure long-term species viability listing the species under the ESA would not be required.

The Wildlife Society offers the following recommendations for the FS and BLM to consider in incorporating sage-grouse conservation measures in their land and resource management plans.

The Preliminary Issues identified:

TWS believes the preliminary issues list developed by BLM and FS is incomplete. The list should also incorporate several factors which are relevant to "greater sage-grouse habitat management." Some of the additional factors that The Wildlife Society recommends including are:

- Wild horses and burros management
- Conifer encroachment and management
- Habitat restoration and subsequent long-term monitoring
- Water management and West Nile virus abatement
- Placement of fences, cell towers, and other related tall structures
- Wildfire management
- Prescribed burning
- Sagebrush management programs (mechanical and chemical)

These major conservation issues and concerns have been synthesized in *Studies in Avian Biology*, Volume 38 (Knick and Connelly 2011).

Lastly, the effects of climate change should be addressed in reference to how they may impact future habitat management decisions. Contemporary attempts to protect and manage greater sage-grouse habitats may prove futile, if climatic changes dramatically alter these environments making them unsuitable for greater sage-grouse.

The preliminary plan criteria:

1st bullet point: The use of the Western Association of Fish and Wildlife Agencies (WAFWA) *Conservation Assessment of Greater Sage-grouse and Sagebrush Habitats* (Connelly, et al. 2004) is useful, but outdated. TWS recommends that FS and BLM review and incorporate information synthesized in *Studies in Avian Biology*, Volume 38 (Knick and Connelly 2011). Currently, the criterion used to develop the preliminary plan omits several key points. We further recommend that the BLM and FS rely on peer-reviewed sources to provide the foundation for this effort so as to most accurately reflect the current research and management knowledge.

11th and 12th bullets: In considering the economic situation—tracking alternative scenarios—to maintain healthy ecosystems, the economic value of wildlife populations must also be considered. Such values include wildlife viewing, hunting, and more.

13th bullet: The Federal Register notice states that BLM and FS efforts will result in…"coordination to determine appropriate local and regional management strategies that will enhance or restore greater sage-grouse habitats." This seems to be an admission that BLM and FS past management actions have had long-term cumulative effects on sage-grouse and that the only mechanism left is habitat restoration. We argue that, given the contemporary wide-spread

distribution of the species and relatively large areas that still provide key sagebrush habitats, long-term conservation of the species is possible (Connelly et al. 2011). Because sage-grouse are a landscape species that inhabit lands owned and managed by multiple jurisdictions, the preservation of large tracts of suitable habitat and the management of these areas to maintain connectivity between populations as well as the ability to document the effects of collaborative actions on population trends are imperative. Thus, it may be more economically feasible to protect the best habitats, than try to recreate them later.

22nd bullet: The Federal Register notice states that, "The most current approved BLM and FS corporate spatial data will be supported by current metadata and will be used to ascertain greater sage-grouse habitat extent and quality. Data will be consistent with the principles of the Information Quality Act of 2000." How will data maintained by the state wildlife management agencies be incorporated into this process? In some cases, state wildlife management agencies may have better and/or conflicting data. Much of the knowledge and expertise on greater sage-grouse resides in state agencies and universities, not with the BLM or FS. We recommend that these sources be fully consulted prior completing greater sage-grouse habitat maps.

23rd bullet: The Federal Register notice states that "State Game and Fish agencies' greater sage-grouse data and expertise will be utilized to the fullest extent practicable in making management determinations on Federal lands." This is an ambiguous statement. Who or what decides what is "practicable"? Presently it does not appear that BLM/FS is using all of the expertise available to it; we encourage the agencies to work more closely with the state agencies.

The BLM has a 'Multiple-Use Mandate'. Clearly, many of the planning criteria identified could have either positive or negative consequences for sage-grouse populations. The document does not explicitly acknowledge the fact that many of the criteria and the mandates may actually be in conflict with sage-grouse management. A number of resource needs and activities that BLM is responsible for managing under the multiple-use doctrine may not compatible with sage-grouse conservation and thus should not all take place at the same time or within the same locations or landscapes. This should be mentioned; such conflict in management will need to be addressed.

Management of sage-grouse populations, as indicated in the discussion of the planning criteria, requires intimate knowledge of what is and what is not sage-grouse habitat. Additionally, this resource data must be spatially depicted across the landscape. The Conservation Assessment provides great insights as to what those habitats should look like. However, when we take a given state or a given population, and look at a map, in most cases, we do not have the ability to identify where those resources occur on the landscape. TWS recommends BLM and FS consult with state wildlife management agencies to incorporate state level research mapping efforts such as the remotely-sensed sagebrush mapping effort in Wyoming that has developed the seasonal sage-grouse habitat mapping project.

The list of plans to be affected:

- The Inyo, Klamath, Modoc, and Lassen National Forests should be included as additional California sites.
- The Salmon-Challis National Forest should be included as an additional Idaho site.
- The Targhee and Caribou National Forests in Idaho have been combined—both Forests have sage-rouse habitat.

- The Beaverhead-Deerlodge National Forest should be included as an additional Montana site.

TWS applauds the effort of the BLM and FS on this document. We recognize that this is a national plan, but to work and truly make a difference for the sage-grouse species and the communities affected, the FS/BLM's Supplemental EIS to Incorporate Greater Sage-Grouse Conservation measures into Land Use Plans and Land Management Plans must be locally adapted and dynamic. The document must foster learning through the most current research and monitoring efforts. As new knowledge becomes available the plans must be flexible enough to incorporate this knowledge into management.

We appreciate the opportunity to offer initial comments on this effort, and look forward to participating further. Thank you for considering the views of wildlife professionals.

Sincerely,

Paul R. Krausman
President