



December 5, 2014

The Honorable Sally Jewell  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C. Street, N.W.  
Washington, DC 20240-0001

RE: Federal Efforts in Range-wide Conservation of Greater Sage-Grouse

Dear Secretary Jewell:

We are a consortium of independent chapters of the National Audubon Society. We applaud recognition by the Department of Interior of the urgent need for rapid, meaningful, landscape-scale sage-grouse conservation actions. We are writing you collectively because we are interested in the establishment of effective, proactive management actions, long-term habitat protections, and funding mechanisms that will bolster Greater Sage-Grouse populations and avoid the need to federally list this iconic species. We believe that the Department of Interior should address the threats to sage-grouse through coordinated and consistent application of science to policy and management actions. While the challenge is great, we firmly believe that success is possible and could be one of the defining conservation efforts of this administration.

A historic effort is underway to protect an imperiled ecosystem—the sagebrush steppe that crosses the Western United States. However, that effort is compromised by myriad threats, and will require bold action to succeed. Habitat loss and fragmentation resulting from wildfire, energy development, urbanization, agricultural conversion, and infrastructure development are all increasing threats to the species. Yet there is still an immediate opportunity for the Department of Interior to act and protect the sage-grouse.

According to the U.S. Fish and Wildlife Service's (USFWS) March 2010 listing decision, Greater Sage-Grouse populations have been declining since the 1960s. Population projections and the USFWS' analysis of threats suggest the declining population trend will continue across the species' range, and extirpation is anticipated in areas affected by energy development and increased wildfire frequency within the next 30 to 100 years.

There are significant additional benefits gained from protecting Greater Sage-Grouse habitat, including preserving habitat for other at-risk species, wilderness-



quality lands, and migration corridors and other important landscapes for elk, mule deer and pronghorn antelope. In addition, local economies benefit from healthy wildlife habitat through a multibillion-dollar outdoor recreation/tourism industry. Communities will enjoy unparalleled recreation opportunities and safe spaces for children to experience the outdoors.

About 51 percent of sagebrush habitat within the sage-grouse range is managed by the Bureau of Land Management (BLM). According to the USFWS' March 2010 listing decision, the BLM's Resource Management Plans (RMPs) "represent a regulatory mechanism that has the potential to ensure that the species and its habitat are protected during permitting and other decision-making on BLM lands."

These RMPs specify management of all land use activities on their lands including travel, energy development, grazing, wildfire, and invasive species management all of which have the potential to affect sage-grouse, including direct effects to the species and its habitats.

As this important planning process goes forward with the BLM's RMPs, we encourage meaningful engagement by federal agency personnel. Concerted and cooperative efforts at the local, national, and federal scale can protect the Greater Sage-Grouse and prevent the necessity of an Endangered Species Act (ESA) listing. Maintaining these conservation efforts in a collaborative manner is necessary for ensuring that sage-grouse remain a state-managed species across the western landscape. It is particularly critical at this contentious time as some Congressmen and states seek to delay the ESA decision and undermine conservation work.

This landscape-scale planning and subsequent implementation is the only way to ultimately prevent the need for an ESA listing; delays and setbacks will only make this issue more difficult and expensive to address.

At Audubon, we believe an effective strategy for protecting the Greater Sage-Grouse will incorporate the following four considerations:

- The BLM strategy, which includes both short-term and long-term approaches, must result in the consistent application of adequate regulatory mechanisms that are scientifically defensible. Given the expanse of sage-grouse habitat managed by the BLM and the short timeline proposed for this regional planning effort, inconsistent application of regulatory protections within states and across the sage-grouse's range could be detrimental to sage-grouse conservation efforts.
- High priority areas for conservation and restoration should be designated by BLM's planning process across the range as core areas. Management actions within these core areas should focus on maintaining and enhancing grouse



habitats and viable populations. However, populations that are small and isolated (such as along the periphery of their range or on seasonal habitats) must also be included in the planning process and given special management considerations. Connectivity areas between populations within states and across state boundaries should be included for consideration and afforded appropriate protections.

- Surface disturbance thresholds are a means of minimizing infrastructure densities, but do not address the distance effect—or indirect effect—of infrastructure. Consider developing and implementing an approach for siting allowable infrastructure within priority areas where direct and indirect effects of infrastructure are minimized.
- Consider developing and implementing a rigorous approach to population and habitat monitoring that explicitly ties measures of habitat condition to population metrics currently being collected (e.g., lek counts; wing barrel information). The approach should be implemented iteratively to effectively inform and guide adaptive management protocol.

The sage-grouse fed the eastward migration of the Native Americans and the westward migration of the European Americans. Although its population once numbered 16 million, it is estimated that there are as few as 400,000 birds remaining today. We see this time, and the efforts underway by federal and state land managers, as critical in determining whether sage-grouse remain an iconic presence on the landscape.

We urge you to take advantage of this narrowing window of time — before the USFWS makes its final determination in September 2015 — to make these Resource Management Plans meaningful in their protections of Greater Sage-Grouse. We recognize that because of the large range occupied by sage-grouse, all stakeholders have an interest in the success of this effort. As Audubon chapters, we welcome the opportunity to engage with federal decision-makers (e.g. BLM and USFWS) at the local, regional, and federal level to ensure that local stakeholders' voices are heard during this historic time for wildlife conservation.

Respectfully,

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CC: Mr. Neil Kornze, BLM Director  
Mr. Dan Ashe, USFWS Director



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