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June 10, 2024

BLM Utah State Office,
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Dear BLM Greater Sage-Grouse Planning Coordinator,

The Flathead Audubon Society composed of over 400 members in northwest Montana, has reviewed your draft Environmental Impact Statement for BLM's Draft Resource Management Plan Amendment for greater sage-grouse and would like to offer the following comments.

BLM should be lauded for developing a range wide greater sage-grouse plan using updated research and information on greater sage-grouse, associated species and their habitats. BLM did a good evaluation of the many daunting significant threats to sage-grouse and their habitats, despite a long history of conflicting legal, financial and political regulations and objectives of the 1872 Mining Act, the Wild Horse and Burrow Act, Mineral Leasing Act, Taylor Grazing Act of 1934 and others that emphasize consumptive resource use. The instigation of the withdrawal of some lands from the 1872 Mining act in some of the alternatives is particularly positive.

Your analyses mention impacts to other associated sagebrush species such as other birds, mammals, reptiles and invertebrates, but does not include recent data showing a 69% worldwide decrease in biodiversity since 1970. (*Almond, REA et al 2002, Ed's. WWF 2020 Living Planet Index. Bending the curve of biodiversity loss. WWF Gland, Switzerland*). North American biodiversity loss was less at 20% but the paper documented increases in anthropomorphic-tolerant species such as ravens--a significant predator on sage-grouse as mentioned in BLM's analysis. Rosenburg et al (2019) documented the loss of 2.9 billion birds in North America since 1970. Many of these species were "common" species such as sparrows and warblers. The bird study relied on bird monitoring data and other sources, which are often under-represented in rural sagebrush habitats. **Significant Impacts of BLM management affect many species and interrelated habitat—not just those listed as sensitive or imperiled and this loss of biodiversity should be addressed in all alternatives.**

Several important factors that would make this plan more effective at restoring sage-grouse were considered by you to be beyond the scope of this analysis, and were deferred to local management or site - specific grazing allotment designations etc. Your Plan fails to ensure that any of these protections and management actions would ever occur, or when such actions might occur, or how site-specific activities would benefit or further impact sage-grouse and their habitats. Further, some of the "out of scope" actions offer no prediction of finances that would support activities such as restoration of habitat. As such, this plan fails to ensure the adequate regulatory actions the U.S. Fish and Wildlife Service would need to avoid the need to list greater sage-grouse on the Endangered Species List.

Alternative 3, the Alternative that we support with recommendations, provides the greatest protection for various sage-grouse management areas, and has the most restrictions to some of the consumptive uses (O&G, Mineral etc.). It is dependent on the adoption of Proposed ACEC's, which we support. Although better than the other alternatives, Alternative 3 does not adequately address restoring or reclaiming lost/damaged habitat, or reducing impacts of existing and historical exploration/development/grazing/ wild horses etc. ALL alternatives have the fatal flaw of examining the affected environment in the current situation, without fully evaluating that past disturbance will continue (and probably expand through cumulative reactions).

Sage-grouse populations and habitat have been experiencing significant and steady declines for decades. Your analysis provided data from USGS that estimated an “80 % population decline from 1960- 2021 and a 41% decline from 2002-2021”. Habitat conversion was noted (from satellite images, not on the ground range conditions) to have declined 3% or more. The Alternatives should show the decline of sage-grouse and their habitats against the cumulative increase in habitat impacts caused by decades of mineral, oil and gas, grazing, wild horse and burrow and domestic grazing, invasive species, rights of way, habitat fragmentation and other development. **These dire impacts have been ongoing, leading to the situation of sage-grouse today.**

All alternatives reduce and/or restrict adverse actions on portions of sage-grouse habitat. This means that the documented decline of sage-grouse and habitats would continue, but at a predicted lower degradation rate for most alternatives. There is no alternative that actually supports increasing sage-grouse numbers or acres of habitat. BLM proposes habitat improvements particularly focused on conifer/juniper removal where these species have expanded into sagebrush habitats and burning/planting to help reduce invasive species and increase important sagebrush species. The research cited by the plan indicates that such restoration of sagebrush could take as long as 20 years. **The success of these treatments on the birds themselves is theoretically possible, but is unknown.** Decades of attempting to restore native habitat after invasive grasses, compacted soils and changes to climate and biodiversity has been a difficult, extremely expensive and potentially impossible task. The Plan offers no mitigation or adaptive management options to ensure that vegetation treatment and planting will actually increase or maintain sage-grouse populations. We do support the effort, but recommend that continued impacts on sage-grouse habitat be curtailed until proposed restoration methodologies are proven.

BLM's provided Alternatives recommend setting aside small patches of protected areas within various sage-grouse habitat areas (SGA, PHMA, SFA, ACEC) such as within new Rights of Ways, mineral leases or other developments. These patches would protect small leks or good grouse habitat areas. These important areas do need protection and seasonal management; however, only protecting nesting/breeding patches is inadequate to address the need for **connectivity to other habitats in case of fire or invasive species** habitat change. Permeable “boundaries” should be incorporated to meet the needs for **juvenile dispersal, various nonbreeding seasonal protection, and support movement to access invertebrate and plant food phenology across changing and diverse habitats.** Habitat patch protection is often inadequate to address these broader less-researched requirements. **Proposed buffers are also**

not large enough. There is a need for a broader landscape approach that provides adequate habitat for juvenile dispersal, adequate low disturbance connections for the community as a whole to allow populations and individuals to escape fire, respond to habitat changes from climate or invasive species habitat conversion, and to allow the interdependent invertebrates to also utilize the changing environment etc. The reductions of habitat disturbance to leks and breeding areas are not enough.

The disturbance caps fail to address the damage already occurring. As stated in your document, many of these existing threshold caps have already been exceeded (Especially in Wyoming). According to BLM analysis, **42 “triggers” were exceeded under existing protections.** Much of the habitat affected by grazing, mineral leasing, oil and gas development, etc. are already under existing leases (which the Plan states cannot be readily changed without permission by the lessee), and BLM defers to local site plans which may or may not adequately address these concerns; or, if they do, BLM may not be able to respond in a timely manner.

The 3 %-5% (5% in Montana under some alternatives) disturbance caps (which BLM has admitted were often exceeded) provides insignificant and unproven reductions of impacts. The reductions of impacts proposed under all ALL alternatives are woefully inadequate to respond to the habitat loss and destruction that has already occurred and all **will cumulatively continue to cause declines/impacts to the species and habitats—even if all future development stops.** For instance, existing roads, oil and gas, coal and mineral sites will further allow the conversion of sage-grouse habitats to invasive grasses and exotic species, increasing raven predation, and noise.

We applaud your efforts to improve sage-grouse and native habitats across the range of the species. Restoration management should be pursued, and adapted over time as new research and approaches become available. **Adequate restoration funding should be included** as a stipulation from any lessee that implements actions that continue to degrade sagebrush habitat or impact the species. Alternative 3 should be **expanded to ensure no further degradation occurs until restoration attempts are shown to be effective at improving sage grouse populations.** Much of the damage to sage habitat has already occurred. These significant losses should not be allowed to continue--at least in occupied sage grouse habitat. Please continue to reclaim native habitats impacted by exotic species, reduce non-native wild horses and burros, increase restrictions on mineral and oil and gas exploration and development (including those already under lease) and ensure low impact uses are allowed only if those disturbances will not further degrade habitat or sage-grouse populations

Funding is the curse of every good plan. This plan depends heavily on site-specific actions at the field level, but those managers are often under extreme local and political pressure to ensure economic activities occur with minimal restrictions at the expense of wildlife and non-consumptive. Documenting terms and stipulations at this Plan level, while allowing field level flexibility is essential if this Plan is to meet objectives. We also request that BLM build in funding to monitor restrictions and improvements so that no “triggers” are exceeded...and if so, that actions must be implemented immediately to reduce the damage and ensure those who exceed limits be **liable financially to remedy the situation,** possibly by providing off-site reclamation.

In Summary:

1. The goal of this Plan and Alternative 3 should be to stop the decline in greater sage-grouse populations and continued loss of sagebrush habitat across BLM ownerships.
2. We believe all proposed alternatives **fail to provide adequate protection** for greater sage-grouse as they do not adequately address past habitat losses and threats prior to evaluating proposed new losses or threats. The final alternative must include some type of cumulative impact analyses with appropriate triggers that cannot be exceeded; if they are, they must be mitigated at a much higher level than business as usual.
3. We support Alternative 3, the best alternative for protecting sage-grouse and their habitat, but it does not adequately address restoring or reclaiming lost/damaged habitat, or reducing impacts of existing and historical impacts of exploration/development/grazing/wild horses or wild burros.
4. Adequate restoration funding should be included as a stipulation from any lessee that implements actions that continue to degrade sagebrush habitat or impact the species. BLM must also be able to fund appropriate monitoring of the effectiveness of recommended restrictions and/or improvements so that no “triggers” are exceeded.
5. If triggers are exceeded, then clear actions must be implemented immediately to reduce the damage and ensure those who exceed limits be liable financially to remedy the situation, possibly by providing off-site reclamation.
6. We recommend a stronger public/private/tribal partnership in every part of Sage-grouse habitat to both coordinate ongoing activities but also leverage funding and opportunities for sage-grouse habitat restoration and eventually sage-grouse population expansion.
7. There needs to be greater research on the use of mitigations such as tree/shrub encroachment burning; sagebrush plantings, etc. There needs to be larger buffers to accommodate climate change, severe weather, food resource requirements for all sexes and ages, and for dispersal/travel corridors to and from other suitable habitats.

Thank you for the opportunity to comment on your proposed Alternatives to manage greater sage-grouse habitat on BLM land. Greater sage-grouse is an amazing iconic species of the sagebrush ecosystem that has been declining for many many decades. The time is now to bring back sagebrush ecosystems and the species that depend on them.

Sincerely,



Darcy Thomas, President
Flathead Audubon Society Board of Director