

**Center for Biological Diversity • American Bird Conservancy •
Advocates for the West • Wild Earth Guardians •
Western Watersheds Project • Wild Utah Project**

August 18, 2014

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

The Honorable Tom Vilsack
Secretary of the Department of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretaries Jewell and Vilsack,

On behalf of the undersigned organizations, we are submitting a *Scorecard for Conserving the Greater Sage Grouse* for your use and consideration in issuing revised resource management plans (RMPs) for the greater sage grouse. The *Scorecard* is primarily based on the USDO I and USDA's own expert recommendations made in the National Technical Team report of 2011, "to ensure that BLM management actions are effective and based on the best available science" for conserving and restoring greater sage grouse populations and habitat.

As you know, the National Technical Team was comprised of 23 federal and state agency biologists and land managers—including 16 USDO I and two USDA experts — and drew from the extensive scientific literature on sage grouse to produce "A Report on National Greater Sage-grouse Conservation Measures" (NTT Report). The NTT was charged with, among others, to:

- "Identify science based management considerations for the greater sage grouse (e.g., conservation measures) that are *necessary* to promote sustainable sage grouse populations, and which focus on the threats in each of the management zones" [emphasis added].
- "Provide assurance that relevant science is considered, are reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented."
- "Understand current scientific knowledge related to the greater sage grouse."
- "Articulate conservation objectives for the greater sage grouse in measurable terms to guide overall planning."

The conservation measures in the NTT Report were derived from "the best available scientific studies" using "best professional judgment." This was confirmed by more than 100 scientists who described the report in a letter to then-Secretary of the Interior Ken Salazar as a "comprehensive compilation of the scientific knowledge needed for conserving Sage-Grouse" that "offers the best scientifically supportable approach to reduce the need to list Sage-Grouse as a Threatened or Endangered species."

It is essential to the conservation and protection of greater sage grouse that USDO I and USDA

follow the conservation measures in the NTT Report in the final RMPs. In fact, the National Technical Team stated that their recommendations should be used “against which management actions and policies of BLM should be weighed.” We agree, and believe that this *Scorecard* is an effective tool for evaluating the RMPs.

In contrast, the “Greater Sage-grouse Conservation Objectives: Final Report” (COT Report) identifies key threats to sage grouse and general conservation objectives for management, but does not provide measurable standards for assessing the adequacy of conservation prescriptions for the species to ensure that conservation measures are effective or will be implemented consistently to stem and reverse the steep population declines that greater sage grouse is experiencing.

We have used the *Scorecard* to evaluate the recently issued Lander Resource Management Plan — the first BLM RMP revision and record of decision completed under the National Greater Sage Grouse Strategy. As the attached graded *Scorecard* demonstrates, the Lander plan fails to adopt adequate conservation measures – including those recommended in the NTT report – and, thus, the Lander RMP will be ineffective in conserving greater sage grouse throughout Lander.

Key flaws in the Lander RMP include:

- ***Allowing new oil and gas leasing within core sage grouse habitat.*** The NTT recommends excluding development in unleased core habitat given the known negative effects of disturbance from fluid mineral development on sage grouse.
- ***Failing to protect sage grouse leks and associated nesting and brood-rearing habitat.*** The Lander RMP fails to protect unleased land, and adopts scientifically untenable lek buffers of 0.6 miles around leks in core habitat. These inadequate buffers stand in stark contrast to empirical scientific information and the NTT Report, both of which recommend much larger buffers to protect sage grouse leks and adjacent habitat – i.e., 4 mile no-surface-occupancy lek buffers for only when there are valid existing rights.
- ***Allowing a disturbance cap in core habitat almost twice as high as recommended by the best available science.*** The NTT says that “where 3% [per an average of 640 acres (one square mile)] disturbance threshold is already exceeded from any source, no further anthropogenic disturbances will be permitted by BLM until enough habitat has been restored to maintain the area under this threshold (subject to valid existing rights).” Yet, the Lander RMP adopts a 5% disturbance threshold, without any supporting scientific evidence that this inflated cap will adequately protect sage grouse habitat.
- ***Failing to protect sage-grouse winter habitat.*** The Lander RMP eschews any real protections for sage grouse winter habitat, instead favoring a seasonal restriction on development within winter habitat. But, permitting the degradation and fragmentation of winter habitat during the non-winter seasons will only slow— not eliminate—the adverse effects of any development on winter habitat. As such, seasonal restrictions on development are tantamount to no restrictions. Further, given that several different breeding populations often use the same winter habitat, the result will be disproportionately large.

We will be evaluating each of the forthcoming plans against the *Scorecard* to ensure USDO and USDA are adopting adequate conservation measures based on the best available science on sage-grouse, and we encourage USDO and USDA to do the same. We support these efforts to revise resource management plans to conserve the greater sage grouse, but the plans must be effective to conserve the species, not half measures to avoid difficult decisions and buy a bit more time while the grouse continues to decline.

We would be happy to discuss the *Scorecard* and any other questions you may have.

Sincerely,



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