



November 17, 2017

VIA E-MAIL – BLM_sagegrouseplanning@blm.gov

Ms. Johanna Munson
BLM Idaho State Office
1387 South Vinnell Way
Boise, ID 83709

Re: Public Land Solutions Comments on BLM’s Notice of Intent to Amend Land Use Plans Regarding Greater Sage Grouse Conservation and Prepare Associated Environmental Impact Statements or Environmental Assessments

Dear Ms. Munson:

Public Land Solutions submits these comments to the “Notice of Intent to Amend Land Use Plans Regarding Greater Sage-Grouse Conservation and Prepare Associated Environmental Impact Statements or Environmental Assessments.” Public Land Solutions (PLS) is a non-profit organization dedicated to providing comprehensive recreation planning and stakeholder coordination to support effective and sustainable public land solutions. Our advocacy efforts to protect and enhance recreation assets on public lands include organizing stakeholder workshops, providing detailed comments and proposed maps during Bureau of Land Management (BLM) comment periods, providing presentations to local and state government, and communicating with a wide range of interested stakeholders. Recreation-related spending on BLM sagebrush lands that support greater sage-grouse habitat has important economic benefits,¹ and this notice of intent to amend sage grouse plans puts sagebrush landscapes and the outdoor recreation opportunities they provide at risk.

Changes to the federal conservation plans for greater sage grouse are not necessary or warranted at this time. In 2015, largely on the strength of these plans, the U.S. Fish & Wildlife Service (FWS) determined that greater sage grouse did not need to be listed under the Endangered Species Act. This decision creates certainty for all who use our public lands, including the \$887 billion outdoor recreation industry,² and helps maintain the \$1 billion in economic output that outdoor recreation on sagebrush lands generates each year.³ This notice of intent to amend those plans threatens that hard-won certainty and could undermine the legal basis for FWS’s 2015 “not-warranted” decision. For this reason, the Interior Department should abandon this unnecessary process and refocus its efforts on faithfully and fully implementing the federal sage grouse plans. Should the Interior Department continue to evaluate changes to the sage-grouse plans, however, it must adhere to the following principles:

Provide robust opportunities for public input prior to making any changes to the plans and related policies: The Bureau of Land Management and U.S. Forest Service provided several meaningful opportunities for the public to review and comment on alternatives and issues associated with the 2015 plans. The BLM must now provide equivalent opportunities including workable comment periods, public meetings and transparent information sharing. Additionally,

the BLM must afford public input opportunities not only in connection with any proposed plan amendments, but also for related policies. This includes the suite of policies that BLM adopted in 2016 to implement key aspects of the plans. Finally, BLM must prepare environmental impact statements (EISs)—not simply environmental assessments—to evaluate proposed changes to the plans. The BLM cannot avoid this requirement by preparing separate amendments for individual states, because those efforts cannot be separated from the broader scope and context of the federal sage grouse conservation effort, which encompasses over 67 million acres of public lands across eleven western states and contains significant outdoor recreation assets. Likewise, as the Interior Department is well aware, this process is already highly controversial and involves significant interest from stakeholder across the West and the public at-large. Thus, BLM must prepare EISs to evaluate any changes to the federal plans.

Preserve key elements of the federal plans, including habitat designations: BLM must maintain core elements of the plans, in particular those that were specifically highlighted in FWS’s “not warranted” decision. This includes identifying and fully protecting high value habitats. It is essential that the BLM continue to protect Priority Habitat Management Areas, as well as General Habitat Management Areas. BLM must also retain measures to reduce destruction and fragmentation of habitat, including no surface occupancy for energy development, lek buffers and surface disturbance caps. Finally, BLM must continue to require mitigation, including compensatory mitigation, for unavoidable impacts. All of these elements benefit both greater sage grouse habitat as well as the recreation setting.

Strengthen key elements of the plans: Instead of weakening the plans, BLM should focus on enhancing and strengthening key aspect of the plans. Areas that could be strengthened include the prioritization of oil and gas leasing and permitting at locations outside of greater sage grouse habitat. The BLM is not currently implementing this important requirement consistently or in keeping with the intent of the plans. The BLM should use this opportunity to reinforce the applicability of this requirement to proposed leases and permits and to provide clearer guidance to state and field offices on such prioritizations. The BLM also lacks clear guidance on the management of grazing in sage-grouse habitats, which has resulted in widespread confusion about the plans do/do not for grazing. The BLM should take this opportunity to clarify that the plans do not actually place any additional lands off-limits to grazing, do not contain broadly applicable or one-size-fits-all habitat objectives for vegetation, such as stubble-height requirements, and only require changes to grazing management when habitat conditions are not being met.

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Recreation and related spending on greater sage grouse habitat is an important economic driver throughout the West, with long-term growth potential. While we do not believe that changes to the federal greater sage grouse conservation plans are necessary or warranted, if the Interior Department does pursue amendments to these plans they must provide robust opportunities for public input prior to making any changes to the plans through extensive environmental impact statements. Furthermore, the Interior Department should preserve key elements of the federal plans, including habitat designations, and strengthen key elements of the plans such as prioritizing oil and gas leasing and permitting outside of greater sage grouse habitat designations.

Thank you again for the opportunity to comment on the BLM's Notice of Intent to Amend Land Use Plans Regarding Greater Sage Grouse Conservation and Prepare Associated Environmental Impact Statements or Environmental Assessments.

Sincerely,

A handwritten signature in black ink that reads "Jason Keith". The signature is written in a cursive, flowing style.

Jason Keith
Managing Director
Public Land Solutions

¹ <http://westernvaluesproject.org/new-wvp-report-recreation-spending-on-blm-sagebrush-lands-worth-1-billion/>

² <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>

³ <http://westernvaluesproject.org/new-wvp-report-recreation-spending-on-blm-sagebrush-lands-worth-1-billion/>