United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Idaho State Office
1387 South Vinnell Way
Boise, Idaho 83709-1657

August 30, 2012

In Reply Refer To:
6500/6515/6520 (930)

Honorable C. L. "Butch" Otter
Office of the Governor
PO Box 83720
Boise, ID 83720

Dear Governor Otter:

I appreciate your letter of August 17, 2012, and our discussion about sage-grouse management at your annual trail ride in June. As I indicated during our discussion on the trail ride, I am encouraged by the efforts of your Sage-Grouse Task Force (Task Force) and look forward to receiving your final alternative for consideration in our resource management planning effort. I share Idaho's goal of long term conservation of sage-grouse and its habitat, which may make it unnecessary to list the species under the Endangered Species Act.

We support the efforts of the State of Idaho and your Task Force to advance sage-grouse conservation across public lands, state lands, and private lands. The State of Idaho and local working groups have been the foundation for advancing sage-grouse conservation in Idaho in coordination with federal agencies and other partners. Your Task Force represents a diversity of interests and expertise that worked diligently under an aggressive timeframe to develop a draft alternative. This spring we committed $75,000 towards the task force planning effort and my staff actively participated in all task force meetings as technical advisors. My technical staff has thoroughly reviewed the State of Idaho's Draft Alternative released to the public in June and we believe it is a thoughtful approach to sage-grouse conservation on public lands. Jeff Foss and wildlife specialists on my staff have had follow-up discussions with Tom Perry and Virgil Moore to share ideas as the Draft Alternative is being finalized.

Your letter requested feedback on two questions: 1) Whether the management framework outlined in the State of Idaho's Draft Alternative—based on a thematic habitat continuum and population metrics—represents a sound policy that should move forward; and 2) Whether the State of Idaho's Draft Alternative is consistent with the agency's multiple-use mandate as well as the National Greater Sage-grouse Land Use Planning Strategy. The management framework detailed in the Idaho's Draft Alternative provides a sound management platform and represents one in a range of alternatives we will fully consider in our resource management planning process that is underway. The management framework outlined in the Draft Alternative incorporates habitat information and population metrics that are central to developing a sound management strategy. The adaptive regulatory triggers and emergency response outlined in the

Draft Alternative represent an innovative approach to addressing the complex and dynamic threats that influence the sage-grouse habitat. Adaptive management is of particular importance in Idaho where the threats of wildfire and invasive species are actively impacting habitat conditions and maintenance of large, intact stands of sagebrush.

The management framework for the Draft Alternative addresses many of the issues we received from the public during scoping and many of the responsibilities the BLM has as a multiple-use agency. For example, the Draft Alternative provides a strategy for guiding land management activities to address the primary threats of wildfire, invasive species, and fragmentation of habitat resulting from large-scale infrastructure projects. The Draft Alternative also provides a strategy to address impacts to sage-grouse habitat from improper livestock grazing and recreation activities. A rigorous analysis of a range of alternatives in BLM's draft Environmental Impact Statement (EIS) will provide the basis to evaluate the effectiveness of the alternatives in achieving sage-grouse conservation. Upon public review and comment and development of a final EIS, I will have a reasoned basis for issuing a final decision to amend our resource management plans by 2014.

BLM's National Greater Sage-grouse Land Use Planning Strategy provides guidance for incorporating the National Technical Team report "into at least one alternative in the land use planning process." The National Greater Sage-grouse Land Use Planning Strategy also provides guidance for use and update of preliminary priority habitat and preliminary general habitat maps that were developed in coordination with the Idaho Department of Fish and Game. The State of Idaho's Draft Alternative meets the purpose and need of the sage-grouse program and is responsive to BLM's National Sage-grouse Planning Strategy which calls for explicit objectives, desired habitat conditions, management actions, and area-wide use restrictions. Given that the National Greater Sage-grouse Land Use Planning Strategy is largely guiding the planning process, I believe it is reasonable to add the State of Idaho's Alternative to the range of alternatives analyzed in the EIS.

BLM's interim management of sage-grouse is outlined in IM 2012-043 which provides policies and procedures for management while the resource management plans are undergoing amendment and revision. The instruction memorandum states *"BLM field offices do not need to apply the conservation policies and procedures described in this IM in areas in which (1) a state and /or local regulatory mechanism has been developed for conservation of the Greater Sage-grouse in coordination and concurrence with the FWS; and (2) the state sage-grouse plan has subsequently been adopted by the BLM through the issuance of a state level BLM IM. If BLM programs are not addresses in the adopted state Greater Sage-grouse Plan then program direction will default to the policies and procedures set forth in this WO IM."* If the U.S. Fish and Wildlife Service provides concurrence on Idaho's regulatory mechanism for the conservation of Greater Sage-grouse, Idaho BLM will initiate discussions with your staff about BLM policy considerations and organizational capacity for potentially adopting the State's Final Alternative as interim direction until the BLM issues the final EIS and Record of Decision, by the end of 2014.

I appreciate the continued strong coordination between the State of Idaho and Idaho BLM in the conservation of sage-grouse and public land management. We will continue to be actively engaged with sage-grouse planning efforts led by the State of Idaho and look forward to receiving your final alternative for inclusion in our EIS effort. My primary management point of contact for sage-grouse conservation is Jeff Foss, Deputy State Director for Resource Services (208-373-3801).

Thank you for your leadership in advancing conservation of sage-grouse and close coordination with Idaho BLM regarding public land management in Idaho.

Sincerely,

Steven A. Ellis
State Director
Idaho BLM