From:	Trina Vigil
To:	Nicole Alt; Kate Norman; Michael Thabault
Subject:	ESO-00061936 - Comments on Greater sage-grouse and Super PACs
Date:	Thursday, March 26, 2015 10:45:59 AM
Attachments:	Wildlands Defense incoming March 13 2015.pdf DTS_Control_Slip.pdf

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Correspondence from Wildlands Defense in regards to GRSG and super PACs

Action: Appropriate Action
Due Date: NA

**Last few pages were damaged by screening machine part of correspondence is unreadable.

WILDLANDS DEFENSE

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March 13, 2015

Sally Jewell, Secretary of Interior
Dan Ashe, Director USFWS
Neil Kornze, Director Bureau of Land Management
Department of Interior
1849 C Street Northwest
Washington, DC 20240

Dear Interior Secretary Jewell, BLM Director Kornze and Interior Department Officials,

75243

WildLands Defense is alarmed at the proposal laid out in an October 27, 2014 USFWS memorandum and map that FWS developed in conjunction with BLM. The Memo is entitled: *Greater Sage-Grouse: Additional Recommendations to Refine Land Use Allocations in Highly Important Landscapes*. The Highly Important Landscapes are termed Super PACs. The map shows an extraordinarily small area of "Super-PAC" land.

We do not support this latest agency sage-grouse habitat segregation scheme. The land area identified in the earlier USFWS COT PAC process, and in other habitat segregation schemes in recent years, was also already much too small to provide for effective conservation of populations of greater sage-grouse across the species range.

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Now the Super PAC mapping acreage cuts are the latest in a series of USFWS and BLM efforts to reduce acres of habitat of significant importance to greater sage-grouse conservation to a very small land area - which will never be sufficient to preserve the species. We have included a series of maps from the FWS COT Report and the SuperPAC map at the end of our letter showing these dramatic cuts.

First and foremost, all agencies in Interior must commit to protection of all remaining populations of sage-grouse within all habitats that are occupied by the birds, and also protection of lands that are identified for restoration. The Super-PAC concept, to be of value to conservation, must be applied to **all remaining occupied sage-grouse habitat and identified restoration habitat for this landscape species.**

Habitat Mapping Cuts in the Past 5 Years

The Interior Department is dramatically shrinking and whittling away at habitats of high concern with each new mapping scheme. This long series of agency efforts to cut back on habitat protections to benefit industry includes:

***Doherty et al. 2010 "Core" habitat mapping under former Interior secretary Ken Salazar. This used the Core habitat approach to focus conservation only on the areas near leks where sage-grouse were most numerous – relegating 25% of the population and large areas of occupied habitats to lesser status for conservation concern.

***BLM PPH/PGH mapping. In 2011-2012, PLM segregated occupied habitat into Priority and General Habitat. This diminished the areas of Key and other habitats whose importance had long been recognized in many Land Use Plans (MFPs/RMPs) and state plans at that time. This down-graded management concern and protections for vast areas of Occupied habitat that were relegated to the General categories.

*** The severely flawed USFWS COT PAC habitat mapping of 2012-2013. This politics-laden FWS closed door process significantly cut and down-graded habitats across southeastern Idaho, portions of Utah, Oregon and other occupied habitats.

*** The series of BLM Greater Sage-grouse Draft EIS and RMP processes across nearly all of the species range, with most issued for comment in winter-2013-2014 and the FEIS still to be finalized. The PPH and PGH segregation is now being replaced by lands segregated into three categories, typically termed Core, Important, General or some variation on this. But Core habitat here is not the same as the Doherty 2010 Core.

And once again, land acreage and mapping showing the areas of highest priority for sage-grouse conservation shrunk – often dramatically. In the BLM EIS process, federal agencies capitulated to increasing efforts by states to down-grade occupied and restoration habitats in a series of deficient state plans (such as Idaho's). Segregating habitat into three categories, immediately cutting down on the acres of the highest Priority habitat. This three category segregation pervades the EIS's across the species range.

Now, the late 2014 Super PAC scheme represents a broad-scale slashing of habitats of Highest importance to a mere 16.5 million acres.

At this rate, FWS will be recommending zero acres for conservation by the end of 2015! The sage-grouse "umbrella" concept for saving species dependent on the sage-grouse biome has been reduced to what can only be termed a smidgen of the species former range. Sage-grouse historic range may have encompassed nearly 297 million acres.

With the Super-PACs, the habitat segregation cuts have reached an absurd point. These continued agency habitat segregation and reduction schemes superlatively illustrate the **failure of existing regulatory mechanisms, and demonstrate the need for expeditious Listing of sage-grouse under the ESA.**

Thus, SuperPACs help carve up the landscape with a management scheme that enables the species' incremental extinction – **as all less special habitats will be sacrificed to one degree or another under agency day to day "multiple use" management.**

An E& E article describes how Interior in 2014 formed a Dream Team of non-sage-grouse biologists to "save" sage-grouse. http://www.eenews.net/stories/1060009471/print

Only one of the people Interior chose for the Dream Team had ever seen a sage-grouse! We fear such lack of experience with sage-grouse and the sagebrush biome is why they were chosen, since biologists more attuned to the needs of this landscape species would not countenance such a drastic shrinking of important habitat as takes place with the SuperPAC scheme.

Additional Details on the Series of Segregation Schemes

Sage-grouse are a landscape species.

Doherty et al. 2010 Core. Despite abundant publicity heralding the lek-based Core mapping in 2010, there has been significant conservation concern about reliance on a lek-based "core" approach for habitat range-wide. The Core approach was developed in the relatively continuous and more uniform landscape of Wyoming. It segregated occupied habitat into areas of lesser importance (including sometimes to please energy interests, powerful ranchers, etc.). The Core habitat segregation scheme made it easier for agencies to begin the process of sacrificing habitats to industry in areas where sage-grouse were less numerous, and at times to favor well-connected ranchers, energy developers, miners and others.

The Core scheme especially handicaps conservation of sage-grouse populations in Basin and Range and other naturally fragmented and heterogeneous topographical settings, as well as the populations that now exist in shrinking and ever-more isolated pockets due to human development and habitat degradation resulting in expanded human-caused fragmentation.

The Core habitat mapping effort and its derivatives knowingly wrote off a percentage of the population. This is ecological madness for a species known to be in decline, and facing unprecedented energy development, fire, chronic livestock grazing degradation and other threats, described as "death by a thousands cuts". Many of these threats, such as livestock grazing, are known to be amplified by climate change.

USFWS COT PACs. The COT report made large cuts to habitats long identified as being of conservation importance. It then went on to claim that PACs represent *"the most important areas needed for maintaining sage-grouse representation, redundancy, and resilience across the landscape."* COT Report at 13. Yet the process by which specific areas with concentrations of active leks were omitted from PACs in the COT (like the

Big Desert area in Idaho and land areas in southeastern Idaho) is mysterious, and appears to have often been based on political reasons, bearing little resemblance to the biological needs of the species. The COT PAC land areas selection process arbitrarily varied from state to state. FWS wrote off small populations in their entirety. FWS appeared to capitulate to politically tainted state plan cuts in habitat (as in Idaho) in its delineation of the COT PACs. While Nevada did not suffer immense cuts with the PACs, the new SuperPAC cuts are devastating and will lead to widespread sage-grouse extirpation across much of the Great Basin.

USFWS-BLM SuperPACs. Both the COT PAC cuts, and now the SuperPAC habitat slashing omits vast areas of the landscape long-identified for sage-grouse conservation.

The cuts includes large areas where extraordinarily expensive so-called "habitat restoration" efforts have taken place, or are planned. In fact, NRCS just published a new report touting how it had spent hundreds of millions of taxpayers dollars and hoped to spend hundreds of millions more – on many of the land areas that the FWS COT PACs and the Super PACs writes off. So while federal agencies are in the process of spending a half a billion dollars or more of tax dollars, much of it is being spent in the areas of lesser conservation concern under the FWS COT PACs and Super PACs

Moreover, these immense sums are being spent by NRCS and other agencies on projects that closely resemble livestock forage production and infrastructure schemes of the past. These projects involve even more livestock facility sprawl, and alteration and "eradication" of native vegetation. These identical practices in past decades drove habitat fragmentation, and helped push sage-grouse populations towards their current depressed state. The COT PAC and SuperPAC mapping shows these sums are being wasted on lands the agencies have no intention of managing to prioritize sage-grouse despite spending hundreds of millions of tax dollars in these very areas.

By focusing on only the areas where sage-grouse are (or *were)* most numerous (based on what in reality are very old lek count data used to determine abundance), FWS gives tacit approval for smaller populations to continue to decline and blink out. FWS appears to be abandoning its mission, and instead is behaving like an overt pawn of industry, shrinking important habitat acreage with each passing year.

Concern about Agendas Driving Wilderness Production SuperPACs

Interior's recent embrace of the shrunken SuperPACS may in part driven by administration concessions to what has become a large Foundation-funded wilderness-production machine. Land protection agendas of some conservation groups are often driven by the foundations that may benefit from the distraction from integrated public lands protections that land preservation "campaigns" provide. The flawed end product also diminishes the intrinsic wildness of the so-called wilderness, such as a series of recent designations that fail to protect inherent values of Wilderness.

http://www.publiclandsranching.org/pubfiles/PDF/donahue_public_lands_grazing_capture.pdf .

Harmful land uses that threaten sage-grouse will be shifted and intensified across the non-Super PAC areas. These lands will become incrementally degraded sacrifice areas. In fact, this pattern is precisely what we have been observing with the BLM's PPH and PGH segregation scheme in practice.

Since the PPH and PGH habitat segregation mapping tock place, BLM has been justifying permitting additional livestock facility sprawl and other harmful activities in PGH – because it is mapped as being of less importance. BLM has even gone to great lengths to segregate habitats within PPH into areas of less importance. For example, see Idaho BLM Owyhee 68 allotment livestock grazing EA processes, where harmful livestock seasons of use and stocking levels are justified in some PPH habitats that are supposed to be recovering from fires. BLM maps "PPH Grassland" for example, (and de facto treats these lands, based on the percent of sage vs. grassland inartificial barbed wire pasture configurations), as a relative sacrifice area. This is despite the need of sage-grouse for blocks of undisturbed habitat, desperately needed recovery of sage and understories in PPH "Grasslands" to prevent cheatgrass invading livestock-degraded sites, and extensive conflicts with nesting habitat security.

All Occupied habitat must be managed as highest Priority habitat. There has already been a dramatic reduction in occupied habitat. Fragmentation of remaining habitats abounds, and is getting worse.

Beyond incessant development pressures and chronic poorly controlled livestock degradation and conflicts --- events in the natural world are highly unpredictable and can rapidly cause population declines over significant areas. It is hubris to believe that climate-driven wildfires and other annual invasive grass expansion in chronically grazed habitats will not get worse, and continue to eat away at habitat across the species range. No matter if NRCS and other agencies spend billions of dollars chopping junipers and crushing sage. Given this, slashing habitat of importance to an extremely small amount makes even less ecological sense.

Effective Conservation Is Urgently Needed

Enhanced conservation measures must eliminate human disturbances and infrastructure, and restore sage grouse habitats moving forward.

Effective protection of federal lands must include all occupied habitats to provide certainty for long-term sage-grouse persistence. This certainty requires meaningful conservation measures across all occupied sage-grouse habitat. Threats must be ameliorated across all greater sage-grouse habitat.

This same method Foundation-driven agenda now appears to infecting sage-grouse habitat conservation. Narrowing sage-grouse conservation focus to token areas compared to the former expanse of the sagebrush ecosystem and of still occupied habitats provides cover for some parties to justify looking away from harmful impacts taking place across Occupied habitat. The "Just give us this Special Area PAC or Super PAC area as Wilderness or a Monument - and industry can have the rest" mentality is being legitimized by the dramatic FWS cuts of the SuperPAC habitat scheme.

The SuperPACs are the latest bright shiny objects used to distract the public from caring about protections across Occupied habitats.

See for example:
http://www.counterpunch.org/2004/10/09/how-the-pew-charitable-trust-is-smothering-the-grassroots-environmental-movement/
http://forestcouncil.org/how-pew-charitable-trusts-sabotages-destroys-environmental-protection-efforts-what-others-are-saying/

http://wildernesswatch.org/newsroom/guardian/Selling_Out_Environment.html

https://wildernesswatch.wordpress.com/2014/12/11/so-called-conservation-groups-betray-wilderness/

It appears to be to the benefit of the parties involved in the Foundations to finance such campaigns that distract from the protection of the larger body of public lands sage-grouse habitats – where they may be invested in activities (such as oil and gas or mining) that are eating into occupied habitats. See Cockburn and Silverstein 1996, describing how the system worked at that time.

Land Management Agency Culture Means That Identification of SuperPACs Will Diminish Importance of PPH/PGH, PACs, and Designations That Arise from GRSG EIS Process and PACs

The culture of federal land management agencies is to yield when faced with development and pressure from the livestock and other industries. Designating a small land area as a Super PAC will inevitably cause harm to the non-Super PAC lands and birds.

Interior officials certainly must know the realities of the "multiple use" management paradigms. The culture of public lands agencies buffeted between politically powerful public lands stockmen, energy developers and miners vs. the need of wildlife for food, cover and space – is to yield. See Professor Debra Donahue's paper on *Capture*

Ameliorating identified threats to greater sage-grouse in all occupied habitat will require application of precautionary management and the best available science.

Vital Landscapes and Populations Are Omitted from SuperPACs

Many areas of relatively contiguous federal land with higher sage grouse population densities and remaining habitat have been excluded from the current COT PAC.

This is much worse in the SuperPAC designations. The SuperPAC process appears strongly biased against sage-grouse populations occupying landscapes with Basin and Range topography. An example is the naturally fragmented habitats of central and southern Nevada and Utah in the Southern Great Basin Population. Here, leks are found in valleys and low ridge and alluvial fans above which rise rugged mountain ranges. Thus the density of leks in any one area in areas with Basin and Range topography is naturally limited by physiographic constraints. The Core-like approach of merely drawing a circle with a diameter extending outward from leks with higher numbers of birds will not effectively capture how the landscape is used by sage-grouse in fulfilling their seasonal needs across the landscape.

Areas of the landscape occupied by the Northern Great Basin population in northern Nevada are severely degraded by intensive livestock grazing and facilities (fences, water developments), yet this area passed muster as a SuperPAC. Some SuperPAC lands here contain extensive crested wheatgrass and/or failed fire rehab areas with annual exotic invasive grasses and that lack sagebrush shrub cover at present. Yet these areas are embedded within a large SuperPAC while the more intact Southern Great Basin population habitats are cast aside by FWS in this latest scheme.

Nearly all populations within the Southern Great Basin population are omitted from SuperPAC status. This is despite the relatively higher degree of intact sagebrush communities with less wildfire disturbance in many areas. The Southern Great Basin populations, as identified in the COT PACs in Nevada and areas expanded from the COT PACs in UT must all be managed as SuperPACs.

The southern Great Basin population is threatened in Nevada by incessant grazing disturbance promoting invasive species, and BLM and FS sagebrush treatments such as the Ely BLM Cave Valley and Lake Valley Project. Plus there are large-scale and growing threats hard rock gold and other mines (the mines are very large grazing permittees in this area as well) which fragments habitats and causes aquifer drawdown, as well as the Southern Nevada Water Authority aquifer mining and infrastructure development proposal, and now even some oil and gas development.

All lands where sage-grouse populations are low and are threatened by incompatible land uses must be fully protected – the Weiser Idaho population, the Baker-Oregon population, northwestern Colorado, Utah's Parker Mountain, Hamlin Valley in Utah, the

Powder River Basin, Laramie Plains, Jackson Hole in Wyoming, habitats in North and South Dakota. Protecting the most at-risk populations is essential to maintain genetic diversity and population connectivity, and to maximize the potential for the survival of the species.

In Idaho, it is difficult to determine from the scale of the mapping of the lands in the southern Big Desert population with numerous occupied leks are included. If not, the area should be expanded to include lands south and east of Craters of the Moon and extending outside the Monument boundary. It must include expanded areas in the northern Jarbidge region and include significantly more area extending east across southern Idaho (in the northern Great Basin population).

In this severely flawed process, FWS and BLM have delineated SuperPACs based on sage grouse population densities primarily as mapped in 2004, with a little tweaking. Agencies are living in the past, including in their acknowledgment of how much worse habitat conditions and bird numbers are now - for example, the massive Murphy Complex fire of 2007, the 2008 Nevada fires, the Holloway and Long Draw fires in NV and OR in 2012, all have occurred since then. It is also unclear to what degree agencies are still relying on the now outdated Garton et al analysis in Studies in Avian Biology, which was based on 2007 and prior lek counts. Current and much more robust population analysis must be applied using lek and other data up to the present.

Interior Must Focus on Reining in Threats to All Occupied Sage-grouse Habitats

Oil and Gas

Agency mapping must be provided that shows the current area of land leased for Oil and Gas in all occupied habitats so that the magnitude of buy backs or other conservation efforts including protective terminations can be understood and funded. There is an overwhelming body of literature showing the adverse impacts of energy development on sage-grouse.

A moratorium must be imposed on issuance of any new leases.

Mining

Mapping that shows the current area of land with mineral claims and leases in all occupied habitats is also necessary so that the magnitude of the potential mining footprint on habitats and populations can be understood.

Occupied habitats must be closed to future mineral leasing and location, and surface permits on existing mines must not expand. Mining impacts of mining and any other aquifer drawdown activity (including aquifer mining) on de-watering or loss of mesic

brood rearing habitats is a serious concern. Activity and vehicle traffic disturbance of breeding and wintering habitats must not be allowed.

Wind Farms, Geothermal Plants and Wells, Transmission Lines, Gas Pipelines, Aquifer Mining Water Pipelines, Communication Towers and other Infrastructure

Occupied habitats must be excluded from the siting of new energy developments, and other ROWs, and transmission and pipelines. As existing Rights-of-way come up for renewal, they should not be renewed, and/or significant new mitigation must be required. The adverse footprint of existing facilities must be minimized to the maximum extent possible.

Potential geothermal development in areas of the Great Basin and Bi-state sage-grouse habitats would result in transmission lines and industrial development with a significant facility, human disturbance and infrastructure footprint.

Livestock Grazing's Myriad Habitat Degradation and Disturbance Impacts

Sage-grouse require tall residual grass cover and complex sagebrush structure for concealing nests. Livestock grazing causes cheatgrass and other aggressive annual grass invasion (Belsky and Gelbard, Reisner dissertation 2010, Reisner et al. 2013). It seriously degrades meadow, spring, seep and stream brood rearing habitats, and can cause their permanent reduction and loss. Livestock-trampled springs, seep and spring margins, stock ponds and artificial upland water pipeline and trough systems also can create conditions favorable for mosquitoes that may transmit rough West Nile Virus.

Upland livestock water developments expand the range of nest and egg predators and mesopredators, and lead to chronic long-lasting degradation of sagebrush uplands over broad areas. Such water developments, often incrementally expanded across upland habitats, result in significant depletion of understory components of sage-grouse habitats over large surrounding areas. Much of the existing network of unplanned roading on public lands across occupied habitats stems from this livestock facility and management infrastructure footprint.

Livestock water developments are often dug into natural springs, meadows and drainage courses and diminish and/or destroy the areal extent of wetted areas that can support mesic vegetation. They diminish brood rearing habitat area and vital moist sites.

Livestock trampling is not controlled by BLM across uplands, yet trampling greatly impacts and damages microbiotic crusts. Crusts are a critical part of the sagebrush ecosystem that serves as a frontline defense against flammable invasive annual grasses. (Belsky and Gelbard 2000, Reisner Dissertation 2010). Trampling of springs, seeps and small streams is also rarely monitored and controlled. Yet trampling promotes desiccating

hummocks, headcuts and erosion that permanently and irreversibly shrinks available mesic habitat, and accelerates earlier seasonal drying.

Livestock breakage and browse of sagebrush plants results in the structural alteration and simplification of nesting and hiding cover. Over broad areas of the landscape, grazing results in an unnaturally simplified sagebrush habitat with diminished protective cover, and "see through" sagebrush unfit for nesting and unfit for sagebrush obligates like the pygmy rabbit.

Livestock carrion, waste and disturbance from cattle and sheep, and upland water sources all promote nest and egg predation and mesopredators.

Fences injure and kill sage-grouse. Areas beat out by livestock near fences serve as travel corridors for mesopredators and zones of weed infestation. Fence removal, like large-scale water development removal and habitat restoration, should be high priority across Occupied habitats.

Often, the only monitoring metric tracked by agencies is upland utilization, taken at cherry-picked sites distant from zones of more intensive livestock disturbance. Utilization is often measured on only one or two larger sized grass species, and often these larger-sized species that have been depleted. Hence utilization as measured by agencies is completely inadequate in gauging the impacts of livestock use, and the overall amount of essential residual protective cover left for the birds.

In depleted sagebrush communities, often the primary grass species that are present are small in stature, and can receive 10-15% or even less utilization if they are to provide sufficient residual and screening nesting cover for sage-grouse.

Of paramount concern is the fact that BLM and the Forest Service continue to refuse to provide large blocks of habitat free of livestock disturbance during the breeding period (lek through early brood rearing).

Fire and Vegetation Manipulation Projects

Fire (both natural and human-caused) along with agency "treatment"/vegetation manipulation projects have a major potential to destroy and/or degrade sage grouse habitats (Beck et al. 2012; Hess and Beck 2012).

Construction of large sterile fuelbreaks creates hotter, drier sites for flammable invasive grass infestation, and areas for livestock loafing. Clearing large areas of woody vegetation alongside roads and smaller two tracks increases potential for off-road use and catalytic converter fires, as well as adds substantially to the fragmentation of habitats.

Fuelbreaks and treatments also cause significant long-lasting collateral damage to many other species –like pygmy rabbit, and migratory songbird species that require taller sagebrush for nesting- as roads typically follow draws or areas with near drainage courses, or less rocky areas - and these are deeper soil sites that support larger sub-species of big sagebrush and/or more robust sage growth.

In any restoration and rehab seeding efforts, agencies must use only locally adapted native plant ecotypes. Planting of non-native grasses and other non-natives must be prohibited. Exotic crested wheatgrass and other exotics should be a focus for removal and restoration.

Vast sums (hundreds of millions of dollars) are being spent destroying native trees, often with much fanfare as a tremendous boon to sage-grouse. Conifer removal projects should be permitted only where there is evidence that conifers are a significant adverse impact to the population. Only selective hand cutting should be used if and when it is shown based on significant evidence that any conifers need removal. Soil disturbance, flammable weed infestation and spread, damage to sage in understory, and collateral damage to non-target species habitats must be minimized.

Sagebrush must not be "treated", as agencies invariably focus on the denser more structurally intact sagebrush that is at a premium in the landscape, and that is essential to the pygmy rabbit and migratory birds.

Mechanical and chemical treatments aimed at killing sage must be prohibited. Tebuthiuron, Round Up and other non-selective herbicides must be prohibited.

Continued grazing and trampling impacts to vegetation, soils and microbiotic crusts is highly likely to render germination inhibiting herbicides claimed to temporarily set back cheatgrass invasion ineffective over time. Plus these chemicals may inhibit sagebrush germination and have other unintended ecological consequences.

Increased focus on fungal pathogen control of cheatgrass should be paramount (along with removing livestock trampling and other disturbance that causes cheatgrass).

Predators Are A Natural Component of the Ecosystem

Predation is not identified as a primary threat to sage-grouse. However, we include prudent management actions to preclude claims of a need for predator control. These claims serve to distract from habitat conservation actions, particularly in relation to livestock grazing.

Poisoning of ravens and other corvids should not occur in any habitats. Instead, agencies should provide for large blocks of livestock-free habitat during breeding periods (lek, nesting, early brood rearing) to minimize disturbance and predation.

If in a rare circumstance, control is necessary only non-lethal control should be used. There is growing evidence that taste aversion is effective. A series of marbled murrelet and other corvid studies have used taste aversion effectively..

Removal of apex or higher level predators like wolves and coyotes also may increase mammalian predation conflicts with sage-grouse by allowing smaller sized mesopredators like skunks and red foxes to thrive. Plus removal of established pairs of coyotes may result in increased predation by younger animals.

Instead of killing predators, agencies must conserve, enhance and restore habitat.

First and foremost, agencies must require common sense preventive measures and management accountability from livestock permittees to minimize raven and other nest and egg predation. This management accountability includes removal of dead livestock and carrion; no lambing, calving, afterbirth on public lands; no artificial upland water troughs with water throughout the breeding period, etc. See series of Boarman reports on common sense methods to minimize raven conflicts with desert tortoise, with similar methods applicable to sage-grouse. A 2015 desert tortoise conference included presentations on the efficacy of carbachol and other taste aversion to dissuade ravens from preying on eggs. It also included a presentation of work in the Curlew landscape showing sage-grouse apparently avoiding areas with livestock present.

Large ACEC Designations Are Essential Across Occupied Habitats

ACECs are vital as designations to protect Relevant and Important values such as crucial sage-grouse habitats and occupied landscapes, from **irreparable harm**. BLM is to give priority to such considerations as described in FLPMA.

"Transcendental" designations such as the highly compromised wilderness bills produced by many current "campaigns" will not necessarily protect sage-grouse habitats andpopulations from irreparable harm and disturbance. Wilderness Bills are increasingly laced with politically compromised language, are the product of backroom deals and horse-trading that ends up sacrificing important habitats to industry, allow harmful grazing disturbance to continue, and may take many years to be enacted.

In contrast, ACECs can be evaluated and designated with Land Use Plan Amendments through a full open public process, and the identified sage-grouse Values must be protected.

BLM's failure to seriously consider protective ACEC designation is vividly on display in the winter 2013-2014 EIS agency alternatives. This reflects BLM engaging in business as usual, and caving into industry desires. We understand that FWS may have written to BLM seeking ACEC designation in the EIS process, but instead what has been developed

is the woefully deficient Super PACs where the size of the sage-grouse "umbrella" for biodiversity conservation in the sagebrush biome has shrunk to minute size.

The bo[illegible]ine is that sage-grouse habitats and po[illegible]lations are already greatly reduced and ha[illegible] compromised. **All the re[illegible]ied habitat must be identif[illegible]ghold if effective co[illegible]ecies is to occur.** We urge you to a[illegible]T PACs. Sup[illegible]o segregate, sacrifice and downgra[illegible]

Sincerely,

Katie Fite

Katie Fite
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738

FWS COT REPORT MAPS SHOWING MAPPING CUTS TO SAGE-GROUSE HABITATS, AND SUPERPAC MAP

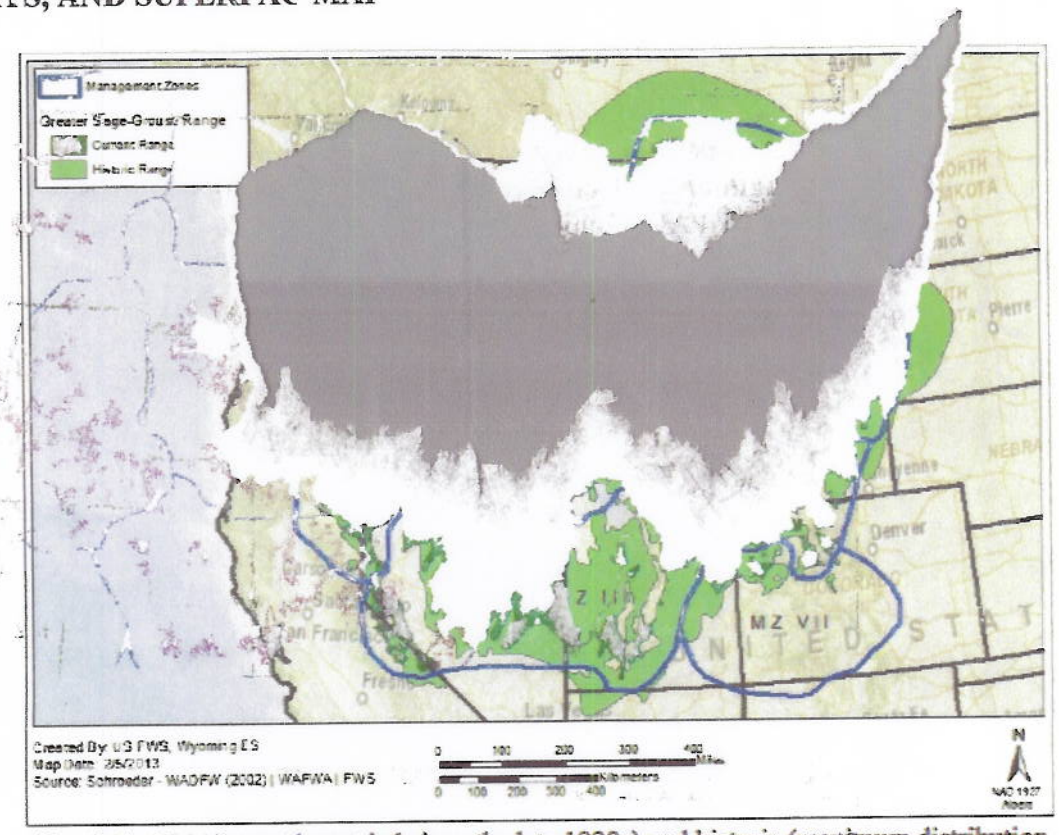

Figure 2. The current (occupied since the late 1990s) and historic (maximum distribution from the 1800s to early 1990s) range of the greater sage-grouse (Schroeder et al. 2004).

Sage-grouse depend on a variety of semiarid shrub-grassland (shrub steppe) habitats throughout

The map above shows the historic range and what agencies (when convenient to make it look like there is a lot of habitat left) call the "current occupied habitat".

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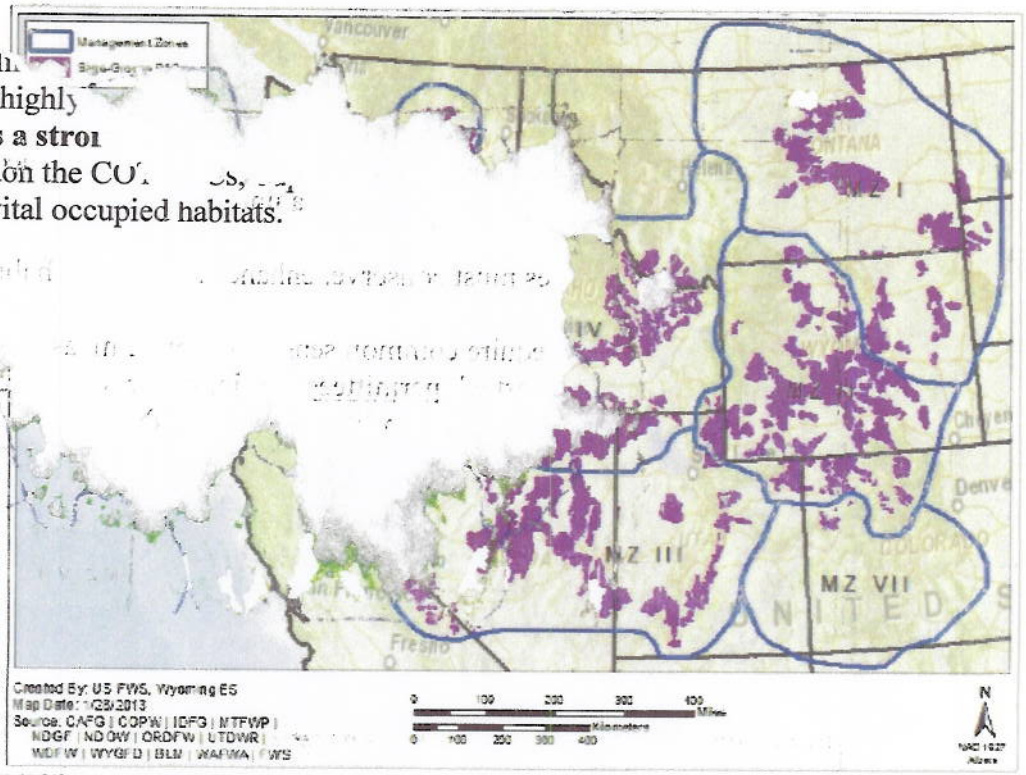
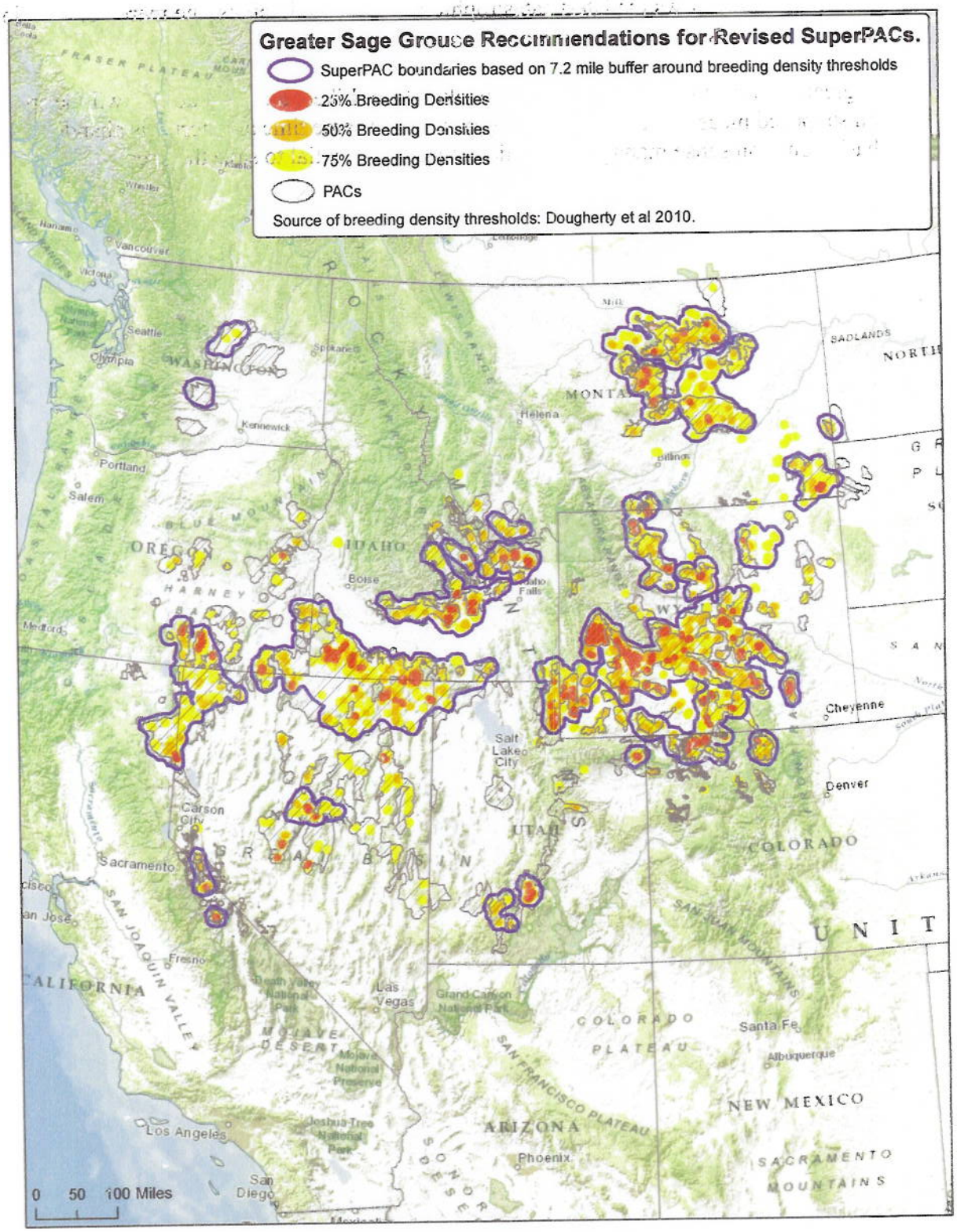


Figure 2. Sage-grouse management zones (Stiver *et al.* 2006) and Priority Areas for Conservation (PACs).


Greater Sage Grouse Recommendations for Revised SuperPACs.
SuperPAC boundaries based on 7.2 mile buffer around breeding density thresholds
25% Breeding Densities
50% Breeding Densities
75% Breeding Densities
PACs
Source of breeding density thresholds: Dougherty et al 2010.
Vancouver
Seattle
Olympia
WASHINGTON
Spokane
Kennewick
Portland
Salem
OREGON
IDAHO
Boise
Helena
MONTANA
Billings
SADLANDS
Cheyenne
Denver
COLORADO
Salt Lake City
UTAH
Carson City
Sacramento
San Jose
Fresno
CALIFORNIA
Las Vegas
Grand Canyon National Park
Death Valley National Park
Mojave National Preserve
Joshua Tree National Park
Los Angeles
San Diego
Phoenix
ARIZONA
Santa Fe
Albuquerque
NEW MEXICO
COLORADO PLATEAU
SAN FRANCISCO PLATEAU
SACRAMENTO MOUNTAINS
SAN JUAN MOUNTAINS
SAN JOAQUIN VALLEY
MOJAVE DESERT
0 50 100 Miles

The above map shows the latest catastrophic FWS cuts to habitats, the mere 16.5 million acre Super PACs.

A great conservation tragedy is about to take place. Likely a billion dollars will be spent on supposed measures to "save" sage-grouse at the same time as Interior is abandoning basic common sense management actions that are essential to save the species.

DEPARTMENT OF THE INTERIOR

TASKING PROFILE

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To (Recipient): Jewell, Sally; Ashe, Daniel; Kornze, Neil

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Subject Text: Comments on Greater sage-grouse and Super PACs

Req. Surnames:

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