

## US Fish and Wildlife Service Issue Statement

### Wildfire-Invasive Grass Complex in the Great Basin and Impacts on Greater Sage-Grouse Conservation

May 22, 2013

Wildfire and the synergistic relationship with invasive annual grasses is the greatest threat to the persistence of sage-grouse and sagebrush steppe rangelands in the Great Basin Region. Invasive annual grasses have altered the fire regime of these landscapes to an extent that often precludes natural succession to an ecological state that provides suitable sage-grouse habitat. Current loss of habitat to wildfire and invasive grasses significantly outpaces natural regeneration and land managers' rate of active restoration of this habitat.

To adequately address this threat land managers must make reasonable assumptions and commit to implementing actions with the intent of arresting this trend. The Bureau of Land Management's (and Forest Service's) current proposed management actions – as reflected in the various alternatives for draft BLM-Forest Service land use plan revisions for Greater sage-grouse conservation and associated NEPA documents – are inadequate to address this threat (see examples, below).

The sub-regional interagency teams in the Great Basin working on the BLM-FS NEPA process are using the Vegetation Development Dynamics Tool (VDDT) tool to model and quantitatively analyze the impacts of the current habitat loss and restoration compared with actions proposed in alternatives. *Preliminary results of the modeling effort show that no alternatives currently being considered will be sufficient to significantly reduce the threat of wildfire and invasive species encroachment in the Great Basin.* The actions currently considered for the modeling effort lack the specificity and certainty needed to analyze and monitor the relative reduction of the threat they are addressing. To change the trajectory of this threat, specific and measurable actions (e.g., commitments) must be made by the land management agencies within the land use plan revision and NEPA process. These actions should be focused on pre- and post- suppression (e.g., fuels management and restoration), since these are the areas where there is the most significant opportunity for improvement. This issue must be addressed consistently across the Great Basin Region prior to the public comment period to ensure a supplemental EIS is not necessary and BLM/FS can deliver these important products to the Service in sufficient time for us to consider them in our FY2015 listing decision.

Through our interaction on the interdisciplinary teams at the staff level, we have communicated the proposed language does not provide us with adequate commitments to determine how the threats will be reduced. Examples of the broad generalizations that we have encountered in this process to date include:

- Suppress wildland fires in intact sage-grouse habitat and utilize appropriate management response where needed to improve sage-grouse habitat.
- Design and implement fuels treatments with an emphasis on maintaining, protecting, and expanding sage-grouse habitats.
- Strategically pre-treat areas to reduce fine fuel through mechanical treatments, grazing strategies, chemical or biological application, etc.

Examples of specific and measurable actions that should be considered for inclusion in BLM-FS land use plan revision and NEPA process include:

- Within five years of signing the Record of Decision (ROD), identify and implement adequate defensible space for priority sage-grouse habitat within the Great Basin and southern portions of the Snake- Salmon-Beaverhead populations to adequately reduce fire size and extent.
- Within one year of signing the ROD, preposition initial attack air resources in priority sage-grouse habitat in the Northern Great Basin population during high fire danger periods.
- Within one year of signing the ROD, identify high-priority restoration areas in the Great Basin population designed to ensure population connectivity.

The above concerns have also been raised by our Regional Management Team members to the BLM's national sage-grouse coordinator and the BLM project leads for the Great Basin and Rocky Mountain regions.