

BLM State Office  
Attn. Patricia Diebert  
440 West 200 South, Suite 500  
Salt Lake City, Utah 84101

BLM-UTAH STATE OFFICE

FEB 09 2022

RECEIVED

February 4, 2022

Dear Ms. Diebert,

I am a biologist with 30 years of experience working on public land issues with the USDA Forest Service, Bureau of Land Management, and the Nature Conservancy. I led the national BLM wildlife office when the Bureau was just beginning its efforts to improve conservation of the Greater sage-grouse. Since that time, despite efforts of both Federal and State agencies, the Greater sage-grouse has continued to decline; 40 percent in the past 20 years and 80 percent since the 1960's.

The 2015 RMP amendments were a good start in improving conservation for the Greater sage-grouse by establishing protections from excessive livestock grazing and mineral development. The 2019 amendments reversed much of that protection by allowing additional leasing of oil and gas, canceling the proposed mineral withdrawal within focal areas, and allowing additional livestock grazing by modifying allowable forage utilization standards. None of these amendments benefited sage-grouse or sagebrush habitat.

Utah and Colorado have been in extreme drought conditions for the past several years, resulting in limited forage production and increased over-grazing by livestock in many areas. Without significant changes to grazing strategies, sage-grouse will continue to decline in these states, since they depend upon healthy riparian systems, grasses and forbs to rear their young.

Specific recommendations for the proposed new planning effort:

1. The 2015 management strategies, not the 2019 amendments should be the starting point for a new management plan.
2. Since sage-grouse populations have continued to decline in most areas since 2015, new management strategies must provide additional protection for sage-grouse habitats than originally proposed, not less protection as the 2019 amendments allowed.
  - a. Utah populations declined 61 percent between 2016-2019
  - b. In Colorado, five out of six leks showed a 69 percent reduction between 2016 and 2019
3. With current drought and the likelihood of future drought conditions, livestock grazing within priority sage-grouse habitat needs to be significantly reduced in order to provide the grasses and forbs needed for sage-grouse to successfully raise their young.

4. Oil and gas leasing and development within sage-grouse habitat in western Wyoming has proven to result in population declines and must be restricted within breeding, nesting and brood rearing habitat. A 2017 study published in the Journal of Wildlife Management found a 2.5% decline per year of male grouse lek attendance over a 24 year period as the result of oil and gas development in close proximity to leks.
5. Roads and trails in close proximity to sage-grouse leks and nesting habitat should be closed to avoid disturbance to breeding and rearing.
6. Utility construction in close proximity to priority sage-grouse habitat should not be allowed. Raptors, a significant predator on sage-grouse, use utility poles as perches from which to hunt which can increase successful predation.

The continued decline range-wide of Greater sage-grouse populations, plus the less certainty of the regulatory mechanisms provided by the 2019 amendments, with their waivers, exemptions and lease modifications is likely to lead down the road to the future Federal listing of the Greater sage-grouse as a threatened species. I urge the BLM to strength its protection for the Greater sage-grouse and its sagebrush habitat through this new planning effort.

Sincerely,

A handwritten signature in cursive script, reading "Christine Jauhola".

Christine Jauhola

Former WO-230 Group Manager, Fish, Wildlife and Forests (retired)  
Glade Park, Colorado