

**From:** [Ted Koch](#)

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**To:** [BLM HQ GRSG Planning](#)

**Cc:** [Preston, Matthew A](#)

**Subject:** [EXTERNAL] Scoping comments on sage grouse plans

**Importance:** Normal

**Sensitivity:** None

**Attachments:** 2022 Feb 7 Letter to BLM re LUP Amendment and GRSG.pdf; ATT00001.txt;

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Pat and Matt-

Please accept these scoping comments on the BLM's intent to amend land use plans for greater sage grouse conservation. I apologize for being after the February 7 deadline.

I hope you are well!

Thanks,

Ted Koch,  
Executive Director,  
North American Grouse Partnership  
208-912-5233



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February 7, 2022

Patricia Deibert

National Sage-grouse Coordinator (Acting)

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Email: [BLM\\_HQ\\_GRSB\\_Planning@blm.gov](mailto:BLM_HQ_GRSB_Planning@blm.gov)

Dear Ms. Deibert,

The North American Grouse Partnership (NAGP) is writing to comment on BLM's plan to address the management of Greater sage-grouse (GRSG) and sagebrush habitat on BLM-managed public lands.

North American Grouse Partnership's (NAGP) mission is to promote the conservation of grouse and the habitats necessary for their survival and reproduction. Established in 1999, NAGP is the *only* conservation organization that advocates for *all 12 North American grouse species* and their habitats. Our strength is found in three key areas - **Science, Policy, and Management**. This is demonstrated by the experience and expertise of our Board of Directors and Council of Scientists and is unparalleled in grouse conservation circles. Our goal is to ensure that grouse conservation is guided by science, public policies are beneficial to grouse and that on-the-ground management of land leads to positive outcomes for grouse.

NAGP is in strong support of this planning effort. In particular, NAGP supports the review, analysis and identification of the threats and potential management alternatives to address those threats to Greater sage-grouse on BLM land. We support updating the habitat maps namely, focal areas, priority and general habitat. As properly noted in the November 22, 2021 Federal Register announcement, a great deal of new knowledge has been gained on sage-grouse ecology and habitat restoration and management since the initial sage-grouse related plan amendments in 2014/2015. This relevant research needs to be incorporated in BLM's analysis of the current situation and development of policies and practices to conserve and improve sage-grouse habitats and populations going forward. Specifically managing and minimizing disturbance, mineral leasing and development, energy development and distribution, livestock grazing, wild horse and burro management, fire management, and habitat restoration/rehabilitation. Compensatory mitigation to ameliorate the effects of unavoidable impacts should be an important management tool.

#### **Invasive Annual Grasses Are The Greatest Threat:**

BLM has acknowledged that in terms of regional issues, within the Intermountain Region, the extensive loss, degradation and fragmentation of sagebrush habitat is the most important issue. And as you are aware, habitat is being lost at an alarming rate due to a substantial increase in invasive annual grasses like cheatgrass and the ecosystem-level changes it precipitates, in part through changing how fire behaves. See "Cheat Takes Over" (Leopold, 1949, "A Sand County Almanac.").

The cause of the substitution by cheatgrass, as Leopold points out, is overgrazing. We therefore urge the BLM to address what it means to "overgraze" rangelands to the point that cheatgrass can infiltrate the understory of sagebrush stands and, with the next wildfire, replace the stand entirely, destroying sage grouse habitat. To accomplish this task, we anticipate the BLM will need to work closely with livestock permittees to develop grazing approaches that support more native bunch grasses and less cheatgrass. We also expect the BLM will need to aggressively address overgrazing by non-native feral horses where this threat warrants such attention.

## **Invasive Grass-Fueled Wildfire Generates The Greatest Rate of Habitat Loss:**

As we know, cheatgrass is nearly ubiquitous in most parts of the range of sage-grouse. It's presence has caused a large increase in the number and magnitude of wildfires over the last few decades. In most instances, these fires are the last step in converting still viable sage grouse habitat to plant communities dominated by exotic, invasive annual grasses resulting in what effectively becomes permanent loss of Greater sage-grouse habitat and reduced connectivity among sage-grouse populations.

The combination of expansion of invasive, exotic, annual grasses and the large, contiguous, frequent fires they facilitate has destroyed tens of millions of acres of sage-grouse habitat. In spite of significant advances in methods to restore sagebrush habitat, losses due to wildfire have far exceeded successful restoration efforts.

We believe effective, initial attack is the key to reducing the spread and magnitude of fire. Although important sage-grouse habitats are given priority for suppression, BLM fire suppression methods in sagebrush landscapes have not changed significantly for decades, nor been successful in protecting sage-grouse habitat.

Typically, a fire detected is initially attacked by ground crews, which are often slow to arrive and may be insufficiently equipped to provide effective control given lost time in transit. Ensuing requests for air suppression, additional ground personnel, and mechanized equipment often arrive too late to prevent a considerably more significant event and catastrophic spread.

With the critical status of sage-grouse as it relates to habitat loss from wildfire in the Intermountain Region, we feel greater emphasis needs to be placed on aerial initial attack. We recommend that BLM complete an analysis of this conservation measure, including cost assessment. We think the additional cost of implementing this new approach will be more than balanced by the reduced cost of rehabilitation.

## **Improved Restoration Techniques Are Essential:**

Given the amount and rate of habitat loss in the range of sage-grouse, an effective and aggressive restoration approach is urgently needed. We urge the BLM to greatly increase its focus on propagating and deploying native grasses, forbs and shrubs in sagebrush habitat restoration efforts. Use of non-native species such as crested wheatgrass may serve as a stop-gap measure, but only by restoring native sagebrush ecosystem components will we be able to fully restore sagebrush ecosystems and sage-grouse. Protection from overgrazing will better keep these habitats in their restored state.

Development of sage grouse habitat must stop. In the recent past, the BLM has tried to implement a management approach that minimized development of sagebrush ecosystems, but these efforts have been less successful than needed. Now, given the ongoing rate of sagebrush ecosystem loss from all causes, including development, the BLM must stop any new development in sagebrush habitats in the future.

We look forward to being involved in and informed of the LUP amendments/EIS process.

Sincerely,



Ted Koch, Executive Director

North American Grouse Partnership

208-912-5233

*The Mission of the North American Grouse Partnership  
is to promote the conservation of grouse and  
their habitats for their survival and reproduction.*