

In the Red

Analysis finds draft greater sage-grouse conservation plans inadequate to protect species



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reater sage-grouse are in trouble. As many as 16 million of these iconic birds once ranged across 297 million acres of sagebrush grasslands, an area of western North America so vast it is called the "Sagebrush Sea." But over the past 200 years, agriculture and development have reduced sage-grouse range by nearly half, and sage-grouse populations have steadily declined.

In 2011, the U.S. Fish and Wildlife Service (FWS) announced that it will consider listing the sage-grouse under the Endangered Species Act (ESA) in 2015. This pending deadline prompted federal agencies to initiate the National Greater Sage-Grouse Planning Strategy, an effort to update land-use plans with new measures to conserve sage-grouse and potentially preclude the need to list the species. With the cooperation of the U.S. Forest Service, the Bureau of Land Management (BLM)—the agency responsible for half of remaining

sage-grouse habitat—is leading this unprecedented effort by the federal government to improve management of 60 million acres of publicly owned sagebrush grasslands in the West.

BLM divided sage-grouse range into 15 planning areas spanning 10 western states and has now produced 15 different draft plans proposing new conservation measures for the species. As decribed in these pages, Defenders of Wildlife analyzed each of the 15 plans and found that many of the conservation measures they propose are scientifically or legally inadequate to conserve and restore sage-grouse. The planning strategy has veered off course. Without a significant course correction, BLM will miss an extraordinary opportunity to not only conserve greater sage-grouse, but also to establish a new management paradigm that avoids conflicts between resource use and conservation values on public lands.



- AMBASSADOR OF THE SAGEBRUSH SEA
- The greater sage-grouse is a symbol of the vast shrublands that once sprawled across 13 western states and three Canadian provinces. Lewis and Clark described the grouse in their journals. Nineteenth-century travelers reported seeing huge flocks lifting from valley floors and darkening the sky. Native Americans emulated sage-grouse in ceremonial dress and dance. Generations of westerners have appreciated these fascinating birds that share their home on the range, and wildlife enthusiasts travel from around the world to see sage-grouse perform their elaborate mating display.
- Sage-grouse require large expanses of healthy sagebrush grasslands, increasingly rare habitat in the West. What remains of the Sagebrush Sea is fragmented and degraded by oil and gas drilling, livestock grazing, mining, unnatural fire, invasive weeds, off-road vehicles, roads, fences, pipelines and utility corridors. And less than 3 percent is protected as wilderness, national park, national monument, national wildlife refuge or other designated conservation areas.
- Sage-grouse are an umbrella species for the Sagebrush Sea—protecting them and the extensive habitat they need would also benefit hundreds of other native species that share their western range. This inludes more than 350 plants and animals of conservation concern, 60 of which are either listed or candidates for listing under the ESA.

METHODS | Evaluating the Draft Plans

Defenders of Wildlife evaluated proposed management actions in each of the 15 draft sage-grouse conservation plans. We specifically looked at whether or not the plans adopted key, science-based, enforceable conservation measures vital to sage-grouse recovery.

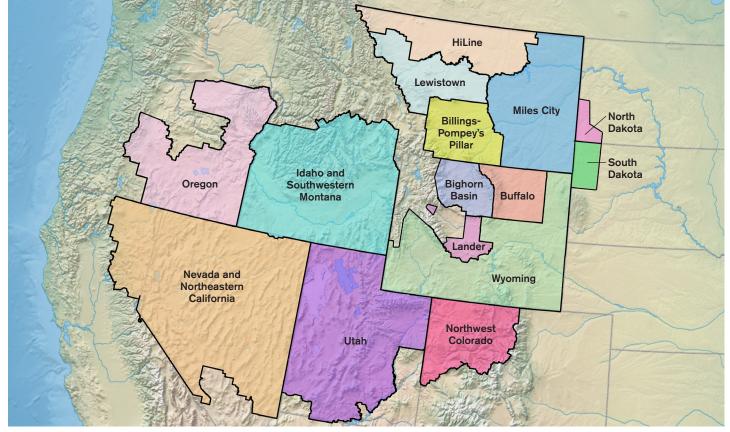
Federal law and policy require agencies to use the best available science in management planning. Fortunately sage-grouse are closely studied and there are decades of research and several comprehensive governmental and scientific reports on the bird and its habitat. We reviewed these sources of the best available science and identified 15 key conservation measures—most of them recommended by the BLM itself—for conserving and restoring sagegrouse and their habitat.

In addition to being biologically adequate to protect the species, proposed conservation measures must be enforceable—there must be certainty that they will be applied. The inadequacy of existing regulatory mechanisms is a major criterion for listing a plant or animal under the ESA, and the lack of such mechanisms, particularly on BLM lands, led FWS to support listing the sage-grouse in the first place.

We evaluated how each of the 15 plans addressed each of the 15 key conservation measures and classified the results in one of three color-coded categories: **adopted key conservation measure** (green); **partially adopted key conservation measure**, i.e., did not make it mandatory, deferred application to future, project-level planning or allowed for discretionary exceptions, waivers and modifications of the measure (yellow); **did not adopt key conservation measure** (red). The resulting chart provides an at-a-glance summary of whether or not the draft plans include the necessary conservation measures.



COTT SMITH



BLM divided sage-grouse range into 15 planning areas, each of which produced its own draft plan. None of the plans include all the key sage-grouse conservation measures recommended by BLM and the best available science.

RESULTS In the Red

The proposed actions in the draft plans would not conserve and restore sage-grouse and their habitat according to the government's own recommendations and best available science. It only takes a quick look at the chart summarizing our results (next page) to see that BLM declined to adopt key conservation measures across sage-grouse range. In most cases, the draft plans analyzed but simply did not adopt the recommended measures, usually proposing weaker alternatives instead (red on chart). Other proposed conservation actions are either discretionary, deferred to future planning or would only partially implement a key measure, which could reduce their effectiveness or render them legally unreliable (yellow on chart).

In some cases, the plans did not adopt the strongest conservation measures for sage-grouse, even when doing so would have only minor impacts on future land use and development. For example, some plans did not propose restrictions on natural gas and oil drilling in essential sage-grouse habitat, opting instead for more accommodating standards—even where there is little potential or interest in developing these resources.



It only takes a quick look at the chart on the next page to see that conservation actions proposed in the draft plans would fail to conserve sage-grouse.

In other cases, the draft plans disregard science-based recommendations for managing sage-grouse habitat. For example, most plans did not adopt specific standards for managing live-stock grazing to maintain habitat characteristics important to sage-grouse—even in essential habitat areas—as recommended in peer-reviewed sage-grouse management guidelines.

Finally, the proposed actions in the draft plans are inconsistent range-wide and between adjacent planning areas. By partitioning the planning strategy into 15 subparts, BLM ended up with a wide range of inconsistent measures that are scientifically and legally inadequate to protect and recover sagegrouse. While there is local and regional variation in sagebrush habitat and sage-grouse ecology, the birds are still affected by the same land uses and management decisions regardless of where they occur. The inconsistencies in the draft plans would produce inconsistent results when implemented, limiting their effectiveness to conserve sage-grouse and sagebrush habitat across multiple planning areas.

Taken together, the draft plans would limit sage-grouse conservation to a subset of essential habitat where development and land use would continue to occur at levels known to be harmful to the species. Our analysis shows that proposed measures in the draft plans would not support BLM's goal of "incorporat[ing] consistent objectives and conservation measures for the protection of greater sage-grouse and its habitat ...in order to avoid a potential listing under the Endangered Species Act."

ADOPTION OF KEY CONSERVATION MEASURES IN DRAFT GREATER SAGE-GROUSE PLANS

Did not adopt measure Did not address Partially adopted measure N/A Not applicable (discretionary or adequacy uncertain) **DRAFT PLANS/PLANNING AREAS** Adopted measure ldaho and Nevada and Billings-Bighorn North Northwest South South-North-Oregon Pompey's Buffalo Hil ine Lander Lewistown Miles City Utah Wvomina Basin western eastern Dakota Colorado Dakota **KEY CONSERVATION MEASURES** Pillar Montana California Designate sage-grouse priority habitat PRIORITY HABITAT Prohibit new surface disturbance // apply protective measures Identify/protect sage-grouse winter habitat Maintain/restore 70 percent of sage-grouse N/A habitat as sagebrush steppe Designate sage-grouse restoration habitat Designate new sagebrush reserves Prohibit surface occupancy // within 4 miles N/A of sage-grouse leks in priority habitat NEW OIL, GAS AND GEOTHERMAL LEASES Limit density of disturbances to 1 well/ N/A N/A facility per 640 acres in priority habitat Limit cumulative surface disturbance to 3 N/A N/A percent per 640 acres in priority habitat Prohibit surface occupancy in or adjacent to winter habitat in priority habitat N/A N/A Prohibit wind energy development in priority habitat LIVESTOCK GRAZING Maintain ≥ 18 cm average grass height in sage-grouse nesting and brood-rearing habitat Control grazing to avoid contributing to the spread of cheatgrass Facilitate voluntary grazing permit retirement in priority habitat Account for climate change effects in sage-grouse conservation measures

RECOMMENDATIONS | Correcting Course

The proposed actions in the draft plans are inadequate to conserve and restore sage-grouse or fail to provide certainty that they will be applied. We recommend that federal planners finalize the 15 plans together in a centralized process that can effectively address the many deficiencies in the draft plans and resolve the inconsistencies among them. This unified, comprehensive approach would also better account for, and direct conservation of, the most important areas for sage-grouse across the West, identifying areas for special protection based on range-wide data, trends and projections.

Regardless of how the plans are finalized, BLM must take the following steps to conserve sage-grouse and their habitat:

- Designate all identified priority habitat in sagegrouse range to support sage-grouse conservation and restoration.
- Protect priority habitat deemed the most important for sage grouse conservation as sagebrush reserves to serve as strongholds for sage-grouse and other sagebrushdependent species.
- Implement consistent, adequate, nondiscretionary conservation measures to restrict or minimize disturbance in sage-grouse priority habitat.
- Maintain and enhance habitat characteristics important to sage-grouse persistence, including large, interconnected areas of sagebrush grasslands.
- Focus restoration efforts on improving habitat quality and connectivity.
- Account for the effects of climate change on sagebrush habitat in sage-grouse conservation measures.

Sagebrush grasslands are one of the most endangered ecosystems in North America and among the least protected landscapes in the country. Protecting large expanses of sagebrush habitat and remaining sage-grouse populations must be the highest priority for BLM conservation plans. In addition to improving land management, the current planning process is also an opportunity for the Department of the



[Agencies] are not yet where we need to be and it is time for...the federal government to redouble [its] efforts so that it can have effective conservation [plans] in place before a listing determination must be made.

-SALLY JEWELL, SECRETARY OF THE INTERIOR

Interior and the Department of Agriculture to identify and permanently protect the most important sage-grouse habitat as new or expanded national wildlife refuges, monuments and conservation areas.

While our analysis found that the proposed actions would not adequately conserve and restore sage-grouse, we also noted that key conservation measures were at least considered in the plans even if they were not included in the proposed management schemes. This gives agency planners a path forward. They do not need to scrap their work and further delay planning and, ultimately, conservation of sage-grouse. The final plans can pull together the best conservation elements of the draft plans, build on them based on our recommendations and create a range-wide conservation strategy that will conserve and restore sage-grouse and transform how our public lands are managed.