My name is Daniel Salemi and I am the President of the Golden Eagle Audubon Society. The Golden Eagle Audubon Society (GEAS) is a 501(c)(3) non-profit organization founded in 1972, based in Boise, Idaho and represents over 1,500 members. Our mission is to build an understanding, appreciation, and respect for the natural world to conserve and restore natural ecosystems for birds and other wildlife. Our area of interest includes Ada, Elmore, Canyon, Owyhee, Washington, Payette, Gem, and Boise counties in Southwest Idaho.

I am writing to submit comments on behalf of GEAS on the Bureau of Land Management’s (BLM) designation of Areas of Critical Environmental Concern (ACECs) in the 2021 Greater Sage-grouse Land Use Plan Amendments (DOI-BLM-WO-2300-2022-0001-RMP-EIS) and analysis in the associated Draft Environmental Impact Statement (DEIS).

GEAS members frequently recreate on BLM lands in sagebrush steppe ecosystems to view Greater Sage-Grouse and other birds and wildlife that use sagebrush habitat. We are very concerned that Greater Sage-Grouse populations have declined 80% across their range since 1965, with over half of that loss occurring since 2002. The survival of Greater Sage-Grouse and other declining species is deeply tied to the availability of healthy sagebrush habitat. The 2022 report, A Sagebrush Conservation Design to Proactively Restore America’s Sagebrush Biome, authored by a group of experts with diverse professional backgrounds and disciplinary expertise, (Doherty, K., Theobald, D.M., Bradford, J.B., Wiechman, L.A., Bedrosian, G., Boyd, C.S., Cahill, M., Coates, P.S., Creutzburg, M.K., Crist, M.R., Finn, S.P., Kumar, A.V., Littlefield, C.E., Maestas, J.D., Prentice, K.L., Prochazka, B.G., Remington, T.E., Sparklin, W.D., Tull, J.C., Wurtzebach, Z., and Zeller, K.A., 2022, A sagebrush conservation design to proactively restore America’s sagebrush biome: U.S. Geological Survey Open-File Report 2022–1081, 38 p., https://doi.org/10.3133/ofr20221081.) found that despite increased investments into the sagebrush ecosystem in recent years, 1.3 million acres of functioning sagebrush habitat continue to be lost every year across the West. Sage-grouse, and the sagebrush steppe ecosystem on which the species depends, need greatly increased conservation efforts to persist, especially since Congress has passed legislation to make protection of the bird under the Endangered Species Act impossible.

Given the continuing decline of Greater Sage-Grouse populations and loss of sagebrush steppe habitats, it is clear that the 2015 management plans were not a strong enough conservation effort to save the species. Damaging activities like fossil fuel development and mining allowed under the 2015 management plans directly led to increased loss of sagebrush habitats, at a time when increased wildfire driven by climate change and invasive species like cheatgrass were destroying even more. Cumulatively, continued habitat loss from various causes will surely result in the continued decline of Greater Sage-grouse and other sagebrush-dependent species.
Because the BLM manages the habitat where most sage-grouse are found, we appreciate that you are revisiting the 2015 management plans and incorporating new science to improve the management of their habitat on public lands. However, the BLM must not continue the same failing approach and should instead designate an ACEC network with strong protections. ACECs can help reverse the continuing and serious decline of Greater Sage-Grouse and sagebrush habitats through special management, and provide an enduring solution to habitat loss.

The BLM should have included the Sagebrush Sea Reserve ACEC network, proposed by a number of conservation organizations including the American Bird Conservancy and several Audubon Society chapters, within its range of reasonable alternatives and analyzed it to allow for a better understanding on how the ACEC network would affect sage-grouse habitats and populations, as well as other species that rely on sagebrush habitats for their survival. The Sagebrush Sea Reserve ACEC network would protect the habitats identified by the US Fish and Wildlife Service as essential for sage-grouse conservation and long-term viability as anchors within the larger matrix of habitat.

Golden Eagle Audubon Society asks the BLM to include an alternative that analyzes the Sagebrush Sea Reserve ACEC network in the final environmental impact statement, or explain to the public the reasons BLM believes the Sagebrush Sea Reserve lands do not meet ACEC criteria, or is not a reasonable alternative worthy of detailed analysis.

The actions of Congress to prevent ESA Listing of Greater Sage-Grouse, and BLM’s unique position as manager of the vast majority of the species’ remaining habitat, make it imperative for the agency to adopt a durable solution to the decades-long planning effort for Greater Sage-Grouse. BLM can do this by protecting the last, best remaining habitat and implementing conservation actions, including habitat restoration, before it is too late. Other uses of BLM-managed land, including oil and gas, renewable energy, and infrastructure development should be directed outside of Priority Habitat Management Areas. The BLM plays a very important role in ensuring we have healthy public lands to hand down to future generations. These lands and the wildlife they support are our legacy.

Thank you very much for preparing the 2021 Greater Sage-grouse Land Use Plan Amendments. The GEAS appreciates the opportunity to comment on them, and the associated DEIS.

Respectfully,

Dan Salemi

President, Golden Eagle Audubon Society

president@goldeneagleaudubon.org