

REVIEW OF EDITS AND COMMENTS ON LEAKED USFWS SYNTHESIS OF SAGE GROUSE INFORMATION

The following observations on the edits and comments on a leaked U.S. Fish and Wildlife Service document, “Synthesis of Biological and Habitat Information for Use in the Greater Sage-grouse Extinction Risk Analysis” (October 18, 2004), were prepared by Dr. Clait E. Braun, Grouse Inc., on December 1, 2004. Dr. Braun is an independent consultant. He is neither an employee or contractor to the Sagebrush Sea Campaign, Western Watersheds Project, or American Lands Alliance. The leaked FWS draft synthesis of information on sage grouse is available at www.sagebrushsea.org/pdf/FWS_SG_analysis.pdf.

1. There are consistent efforts to distance the “Synthesis” from the WAFWA Assessment prepared by Connelly et al. (2004) [see #27 below] as demonstrated starting on page 1: “it is inappropriate to place full reliance” on the WAFWA Assessment “for which there is...no data.... Singling the document out in the preface gives it undue weight.” The edits then go on to delete “This assessment was written by species and habitat experts based on the analysis of information from scientific journals...” The WAFWA Assessment is widely considered the most comprehensive report on greater sage grouse ever written [see #27 below]. The authors and contributors to the WAFWA Assessment share decades of experience studying sage-grouse [see #27 below and author biographies in WAFWA Assessment, pp. ii-viii].
2. The comment by the editor that “we ought not to be including the [90-day] finding (this comment was “based on the DQA petitions”) (p. 1) and the deleted material “and scientific literature available in our files, and other information” reveals a consistent bias in favor of unscientific material. The DQA is the Information Quality Act [see #29-32 below].
3. The comments repeatedly question (and delete nearly every citation to) Connelly et al. (2004) (WAFWA Assessment), Schroeder et al. (2004) (distribution paper published in Condor), Schroeder et al. (1999) (Birds of North American Species Account), Connelly et al. (2000) (WAFWA Guidelines), and Braun (1998) (status paper published by WAFWA). At the same time, the “Synthesis” continually cites these same references in order to refute the information presented in them. Thus, on the one hand these references supposedly have little validity and on the other, they are recognized as major references on sage-grouse. This reflects selective use of citations while disparaging some of the major authors of sage-grouse literature.
4. The edits and comments repeatedly cite Schroeder (1997) (nesting paper in Condor) as evidence that sage-grouse are adaptable to habitat change. But they fail to indicate that sage-grouse in Washington State (the subject of the Schroeder paper) exist in highly disturbed, degraded, and fragmented habitats in a landscape dominated by agriculture. Further, sage-grouse in Washington State only occur in 2 disjunct populations, which are rapidly decreasing towards extinction (less than 1000 total sage-grouse left in the entire state with no linkage to populations in other states or provinces). These two populations of sage grouse were forced to “adapt” to other habitats in Washington. If they failed to adapt, they would become extirpated. The edits and comments about adaptation are without scientific merit.

5. The edits indicate that, because of the comment letters received that question that sage-grouse (p. 6) “are dependent on large, interconnected expanses of sagebrush (Patterson 1952, Connelly et al. 2004),” this statement was deleted. This is absurd and is not supported by science.
6. The edits (p. 9) indicate “that requirement that sage-grouse depend entirely on sagebrush throughout the winter for both food and cover...is an overstatement, as they will eat other stuff if it is available” clearly demonstrates a lack of knowledge of the literature or sage-grouse biology as the comment is without any scientific merit and assumes that sage-grouse could live anywhere.
7. There is a consistent effort to deny credibility to scientific publications and to delete any citations not consistent with the thought that sage-grouse numbers and distribution have not declined.
8. The edits support (p. 9) apparent comments from the Owyhee Cattlemen’s Association with the statement “Frankly, I think the entire discussion of the estimated habitat, estimated range, estimated population should be eliminated as it is ...not supported...” and is “simply a fairy tale, constructed out of whole cloth.” This statement clearly reflects bias, ignorance of the science, and unwillingness to believe anything other than the comments of a public lands user group.
9. There is a consistent effort (pp.14-16) to cast doubt on sage-grouse numbers and any decline in populations from historic levels. The comment is “I am going to take issue with this [dramatic declines in abundance and distribution] since we have historic accounts in our comments that dispute this characterization.” Again, comments of unknown groups or people are given more weight than the scientific literature.
10. Concerning changes in habitat due to agriculture (p. 27), the edits indicate that USFWS is to “replace the generalized horror statistics...if you don’t have the numbers to substantiate the statement [from Connelly et al. 2004], you can’t make it.” The contention that loss of habitat to agriculture is not severe is repeated throughout and is without merit.
11. There is no concern about removal of sagebrush (p. 29) as the edits indicate “And? So what...why do we care?” This demonstrates totally inadequate knowledge about habitat requirements of sage-grouse. The edits delete references to use of chemicals to reduce sagebrush on public and private lands, even though this still continues in sage grouse range.
12. The edits indicate (p. 30) that “Connelly’s word” is not to be trusted as “So whether it’s mechanical or chemical treatment, conversions of habitat forced declines...and...we all know...there is no data to substantiate this, just someone’s opinion” despite solid data that sagebrush treatments negatively affect sage-grouse. The edits discount scientific knowledge.
13. The edits (p. 31) claim “We have no data to support an assertion that fragmentation is occurring at a level that influences sage grouse populations” and then deletes 2 sections about

altered or fragmented habitats and their references. This occurs repeatedly in the edits and comments illustrating preconceived ideas that are not supported by science.

14. Concerning statements that sage-grouse need large expanses of contiguous sagebrush (p. 32), the edits indicate, “the statements are opinion and speculation.” The supporting example from the Strawberry Valley in Utah is deleted! (The sage grouse in Strawberry Valley, Utah, have experienced steep declines due to habitat loss and fragmentation.) The only speculation here is provided by the edits.
15. Complete deletion of data on impacts of power lines, mining reclamation, water developments, livestock grazing, roads, and noise occurs in pages 34 through 47, with comments that “the fact that we are relying on Braun [as a reference], who is a contractor for one of the petitioners is troubling,” “purely opinion on the part of Braun,” and “Braun 1998 is primarily opinion.” At the same time (p. 40) the edits allow speculation by the State of Idaho and throughout refers to comments received from various interest groups as having merit. This approach indicates the edits and comments were provided by someone with inadequate knowledge and who was less than objective.

Dr. Clait E. Braun, Grouse, Inc. Professional Qualifications

Dr. Clait E. Braun is Principal of Grouse Inc., in Tucson, Arizona. Dr. Braun is widely considered a leading expert on sage-grouse ecology and population viability in the United States. He holds a B.S. in Technical Agronomy from Kansas State University, a M.S. in Wildlife Management from the University of Montana, and a Ph.D. in Wildlife Biology from Colorado State University. He has worked on grouse, including both Greater and Gunnison sage-grouse, continuously since 1965 through 2004, and specifically directed and conducted field and library research on sage grouse from 1973 through 2004. He has considerable exposure and knowledge of sage-grouse population biology in all states where the species occurs, and has authored or co-authored over 200 scientific peer-reviewed and technical publications, mostly on birds, including sage-grouse. Since "retirement" as Avian Research Program Manager from the Colorado Division of Wildlife, Dr. Braun has actively consulted on sage-grouse issues in California, Colorado, Idaho, Montana, Nevada, Oregon, and Wyoming as well as on the range-wide assessment for greater sage-grouse completed in 2004.