

June 3, 2010

The Honorable Ken Salazar
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

The Honorable Steven Chu
Secretary of Energy
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Secretaries Salazar, Vilsack and Chu:

The recent finding by the U.S. Fish and Wildlife Service that the Greater Sage-grouse warrants protection under the Endangered Species Act is evidence that current management is failing to conserve the species as required by law. Significant information indicates that habitat loss, degradation, and fragmentation will continue to affect sage-grouse persistence unless management improves. We urge the federal government to take steps now to recover the sage-grouse by working to conserve and restore the species and its habitat.

Approximately 70 percent of sage-grouse current range is on federal land, most of it managed by the Bureau of Land Management (BLM) and the Forest Service, with smaller areas administered by the Fish and Wildlife Service, National Park Service, Bureau of Reclamation and Department of Energy. The remainder is mostly on private land, some of which is affected by programs administered by the Natural Resources Conservation Service and Farm Services Agency (hereafter collectively the eight federal departments and agencies). The prioritization of energy development, livestock production and other land uses on federal and private land, combined with deficient and patchwork management planning, has contributed to sage-grouse population decline.

As a candidate species, the eight federal departments and agencies are obliged to manage federal lands and resources to preserve sage-grouse. The “warranted but precluded” finding presents an opportunity for the Administration to chart a new course for conservation of sagebrush steppe and sage-grouse recovery. As Secretary Salazar noted, “we must find common-sense ways of protecting, restoring, and reconnecting the Western lands that are most important to the species’ survival.” In fulfillment of these goals, we request the eight federal departments and agencies develop a comprehensive, rangewide management plan to protect and restore sagebrush steppe to

conserve Greater Sage-grouse, Gunnison Sage-grouse and many other sagebrush dependent species.

Existing federal management planning in sagebrush steppe has failed to conserve sage-grouse and their habitat. Individually and collectively, federal land management plans do not adequately address land uses and related effects on sage-grouse and sagebrush steppe. The Fish and Wildlife Service similarly found that state and local sage-grouse conservation plans are insufficient to avoid listing sage-grouse under the Endangered Species Act. National sage-grouse conservation plans and related guidance, such as the BLM National Sage-Grouse Habitat Conservation Strategy (2004), fail to provide needed direction for managing sagebrush steppe. For example, timing stipulations and lek avoidance buffers used for mitigating the effects of energy development throughout much of the sage-grouse's range have been shown to be ineffective. Interagency memoranda and conservation plans, such as the Greater Sage-Grouse Comprehensive Conservation Strategy (2006), are only useful if they are binding on their signatories.

The eight federal departments and agencies should jointly develop a Sagebrush Sea Conservation Plan and Programmatic Environmental Impact Statement (PEIS) to conserve sagebrush steppe on federal land throughout the West. The conservation plan and PEIS should be developed under the direction of a team of experts using the best available science. The plan and PEIS should designate and direct management of habitat needed to conserve and recover sage-grouse and other species. The plan must be binding on all federal agencies that manage sagebrush steppe on federal land or influence management of sagebrush steppe on non-federal lands, and amend all existing management plans.

Developing a Sagebrush Sea Conservation Plan and PEIS is the most efficient and effective way to comply with the National Environmental Policy Act and improve management of sagebrush steppe. In contrast, following the past practice of amending individual federal land use plans at the field level will take too long and produce a patchwork of unrelated plans and inconsistent management that is likely to further endanger sage-grouse. With landscape-level planning, federal agencies can take proactive steps to recover sage-grouse while it awaits protection under the Endangered Species Act.

The recent finding on Greater Sage-grouse presents an important opportunity to develop a westwide, comprehensive strategy to improve management of sagebrush steppe. We look forward to working with the Administration to conserve sage-grouse and other sensitive species in sagebrush steppe.

Sincerely,

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WildEarth Guardians
Santa Fe, New Mexico

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Natural Resources Defense Council
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cc: David Hayes, Deputy Secretary of the Interior, U.S. Department of the Interior
Harris Sherman, Undersecretary for Natural Resources and Environment, U.S.
Department of Agriculture
Bob Abbey, Director, Bureau of Land Management
Tom Tidwell, Chief, U.S. Forest Service
Rowan Gould, Acting Director, U.S. Fish and Wildlife Service

Jon Jarvis, Director, National Park Service
Michael Connor, Commissioner, Bureau of Reclamation
Dave White, Chief, Natural Resources Conservation Service
Jonathan Coppess, Administrator, Farm Service Agency
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Ann Bartuska, Deputy Undersecretary for Natural Resources and Environment, U.S.
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