



For America's Heritage

Public Lands Foundation

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These comments are submitted by the Public Lands Foundation (PLF) in response to the March 15, 2024, release of the Draft Resource Management Plan Amendment/Draft Environmental Impact Statement (DEIS) for Greater sage-grouse conservation and management. These comments have been provided during the public comment period which ends on June 13, 2024.

This DEIS would amend the goals, objectives, and management from previous planning efforts in 77 resource management plans with the intent to enhance Greater sage-grouse conservation. The draft plan amendment addresses new scientific information as well as new information identified by state partners (e.g., habitat management area boundaries) while the DEIS analyzes potential effects of six proposed alternatives.

The PLF is a national membership organization that advocates and works to ensure the retention of America's Public Lands in public hands, professionally and sustainably managed for responsible common multiple use and enjoyment. The public lands that we focus on are those that are managed by the BLM.

The PLF supports the goal of this BLM planning effort to conserve and manage habitat to support healthy populations, consistent with the BLM's sensitive species policy and in cooperation with state governments and other conservation partners. Because BLM manages the largest single share of Greater sage-grouse habitat (nearly 67 million of 145 million acres total), it's critical for BLM to have good working relationships with state partners. The PLF supports BLM's commitment to transparency and collaboration in managing habitat important to Greater sage-grouse populations.

Therefore, the PLF encourages the BLM to develop the Final Management Plan Amendment/Final EIS that:

- incorporates more recent science, including climate change science
- strives for more durability than the previous efforts in 2015 and 2019

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- uses a range wide approach (as opposed to state-by-state approaches) in planning and implementation because it provides a consistent structure for public land users and BLM partners
- incorporates a consistent range wide approach when using lek data, to calculate whether triggers were tripped and implementing responses using the adaptive management process (as outlined in one of the alternatives)
- commits to implementing response actions in population areas where the adaptive management triggers have tripped (as opposed to implementing management actions in other population areas)
- considers the use of off-site mitigation and cooperation with project proponents for more effective outcomes for Greater sage-grouse, including the use of restoration and mitigation leases, where appropriate, consistent with provisions in the recently finalized Conservation and Landscape Health Rule
- implements temporary management measures in proposed Areas of Critical Environmental Concern (ACEC) that may support Greater sage-grouse management objectives, consistent with provisions in the recently finalized Conservation and Landscape Health Rule
- obligates the BLM to implement the Monitoring Plan (in an appendix) with timely reporting of monitoring results and implementing management actions to address findings from monitoring reports.

The PLF applauds the BLM's efforts to develop alternatives to Greater sage-grouse habitat management using state partner input.

Sincerely,



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