



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

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RE: PEER's online data center reveals extensive livestock grazing impacts on Greater sage grouse

November 10, 2014

via email: grsg_datacall@fws.gov

Greetings:

Thank you for this opportunity to provide comments to inform the Fish and Wildlife Service's Endangered Species Act listing decision for the Greater sage grouse (*Centrocercus urophasianus*). The Greater sage grouse's precipitous decline is of concern to PEER's members and staff as well as to the millions of Americans who use public lands and value them as a repository of wildlife and healthy, intact ecosystems.

As you know, 64% of important sage grouse habitat (Preliminary Priority Habitat and Preliminary General Habitat) and a full 73% of sage grouse Preliminary Priority Habitat (PPH) is found on BLM grazing allotments. All told, of roughly 20,000 BLM grazing allotments, more than 9,000 contain important sage grouse habitat.

Several agencies have embarked upon significant efforts to examine the principal threats to sage grouse caused by human activity throughout its range, but we are concerned that none of these efforts have given adequate attention to the primary role of livestock grazing in Greater sage grouse habitat decline. The Bureau of Land Management's Rapid Ecoregional Assessments (REAs), launched in 2010, set out to look at the influence of climate change and other widespread, anthropogenic impacts on fourteen ecoregions spanning the Western United States, but over the strong objections of participating scientists, the agency chose not to include livestock grazing as a "change agent" notwithstanding its ubiquity on the Western range. A later analysis by the USGS (USGS OFR 2013-1098, *Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-Grouse* <http://pubs.usgs.gov/of/2013/1098/>) did take grazing into account, as it considered the BLM's Land Health Status (LHS) records compiled as of 2007; however it understated the impacts of grazing for several reasons enumerated below.

Through two Freedom of Information Act requests, PEER has received the 2007 LHS dataset as well as a 2013 dataset which together compile LHS records since the late 1990s when the agency began conducting these assessments. Our analysis of these records is, to our knowledge, the only analysis to date of livestock grazing impacts on sage grouse that incorporates BLM records through 2013 and gives a more complete picture of the impact of grazing on sage grouse habitat. BLM's Land Health Standards evaluations are intended to record any significant cause of failure to meet land health standards. Livestock grazing is the single most frequently cited cause for failure to meet standards within the agency's records.

Many allotments in sage grouse habitat are failing the BLM's own standards for rangeland health

As stated above, a significant portion of sage grouse PPH occurs within BLM grazing allotments. BLM's records reveal that of this habitat, roughly 35 million acres occurs within allotments that have undergone range health evaluation—and nearly 15 million acres of this habitat lies within allotments that the BLM says are failing its standards for rangeland health due to livestock grazing.

Furthermore, of the PPH within allotments failing due to livestock grazing, 90% is in allotments failing due to existing, rather than historic grazing. This indicates that despite nearly 20 years of recordkeeping, the agency's current management of livestock continues to degrade habitat and further jeopardize imperiled wildlife.

Our records also show that almost 15 million acres of sage-grouse PPH--28% of the PPH within allotments--lies within allotments that still remain to be evaluated by BLM. If the agency does not even have data on the condition of allotments in PPH, how can we be assured that its management is adequate to recover the species?

To summarize our findings:

- More than 33 million acres of important sage-grouse habitat (PPH and PGH) is in BLM grazing allotments that have failed to meet rangeland health standards. Of this, more than 24 million acres are in allotments that failed rangeland health standards due to livestock grazing and of this, 22 million acres are in allotments that failed rangeland health standards due to **existing** livestock grazing, rather than attributed exclusively to past grazing management or historic grazing;
- More than 20 million acres of sage grouse PPH is in BLM grazing allotments that have failed to meet rangeland health standards. Of this, nearly 15 million acres is in BLM grazing allotments that have failed to meet rangeland health standards due to livestock grazing and of this, more than 13 million acres is in allotments that failed due to existing grazing, rather than attributed exclusively to past grazing management or historic grazing.

Overall, our analysis reveals that 24% of all evaluated grazing allotments containing sage-grouse priority habitat (PPH) are failing the BLM's own standards due to impacts of past and present livestock grazing, of which 20% are failing due to existing livestock grazing. This figure that is

significantly larger than figures presented in USGS OFR 2011-1263 and USGS OFR 2013-1098 due to several factors:

1. Our figure includes LHS failures attributable to prior grazing management and historic grazing. Prior reports only identified livestock as a cause when LHS failures were due to current grazing, thus minimizing the apparent impact of grazing on sage grouse habitat.
2. *USGS OFR 2013-1098*, in its reporting of threats to Greater sage-grouse, only considered those allotments explicitly recording a failure of the LHS wildlife standard. Failures of upland and riparian standards were excluded, even when the descriptions of those failures indicate that they likely would have impacted sage grouse. Our figure includes allotments failing a standard that can reasonably be considered to be relevant to sage grouse habitat needs.
3. The data used in the analyses reported in *USGS OFR 2013-1098* only contained records through 2007, while our data reflects all records through 2012, fifty percent more allotments.

Current and projected livestock numbers and management must be factored in to the Greater sage-grouse listing determination

To conclude, our analysis indicates that current and historic Bureau of Land Management livestock grazing constitutes a significant threat to the survival and recovery of the Greater sage-grouse. To the best of our knowledge, the BLM is not planning any widespread, programmatic changes in livestock stocking rates or management to prevent further sage-grouse decline and support the species' recovery. In the absence of such changes, we feel it would be prudent to consider the species at great risk of further decline and in need of the protections offered by listing under the Endangered Species Act.

Sincerely,



Kirsten Stade
Advocacy Director
Public Employees for Environmental Responsibility

and

Peter Lattin
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