

Congress of the United States
Washington, DC 20515

December 16, 2021

Secretary Deb Haaland
Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Haaland,

As the Department of the Interior's Bureau of Land Management (BLM) develops revised land management plans for the greater sage-grouse and resumes its evaluation of the proposed mineral withdrawal of public lands in sagebrush focal areas from mineral location and entry, we ask that the agency use the best available science to implement rangewide measures that reduce risks to sage-grouse populations while effectively implementing and maintaining Interior's core mission of multiple-use.

Under the guise of a potential Endangered Species Act listing, BLM is seeking a mineral withdrawal on 10 million acres of federal lands in Idaho, Montana, Nevada, Oregon, Utah and Wyoming. This proposed action not only ignores Interior's mission but disregards the states, local governments, and stakeholders who have consistently proven themselves as the best stewards of their unique landscapes and have implemented successful sage-grouse management and conservation plans to avoid potential adverse impacts.

We maintain that an Endangered Species Act listing is not the most effective way to protect and restore the greater sage-grouse species. In your scientific review of current land management plans and environmental impacts, you will find that any decline in sage-grouse populations can largely be attributed to four main reasons: invasive grasses (i.e., cheatgrass), drought, predation, and insufficient management of wild horses and burros.

Active management of federal lands and removal of cheatgrass, one of the largest contributors to wildfire escalation, should be a top priority and plays a key role in sage-grouse recovery. Earlier this year, researchers found that the removal of invasive vegetation allowed for a 12% faster population growth than in areas without such treatment.¹ As you know, catastrophic wildfires throughout the West have threatened our public lands, waters, and air quality. Increases in burned areas, resulting from more frequent wildfires and invasive grass cycles, has led to elevated nest predation from ravens – which account for a majority of sage-grouse nest failures – and a decline of available nesting areas. Due to the large amounts of sagebrush steppe burned, ravens have exploited the lack of canopy cover typically used to conceal nesting areas.

Further, drought continues to impact greater sage-grouse recovery. We do not believe that it would be fair to penalize western land users for a natural endemic that results in the loss of greater sage-grouse habitat. We must find commonsense solutions to the realities of catastrophic drought that

¹ Andrew C. Olsen et al, *Reversing tree expansion in sagebrush steppe yields population-level benefit for imperiled grouse*, *Ecosphere*, June 9, 2021, <https://esajournals.onlinelibrary.wiley.com/doi/10.1002/ecs2.3551>.

continues to plague much of the West. To ensure sage-grouse habitat is maintained, drought mitigation must be a part of the broader discussion of species recovery. Water storage, wildfire prevention, water user flexibility, and increased coordination at all government levels are imperative.

Additionally, we urge the Department to prioritize actively managing and reducing wild horse and burro populations, as sage-grouse populations would see a significant rebound.² Wild horse and burro populations on BLM lands are three times the appropriate management levels, and these levels have become unsustainable and extremely destructive to western rangelands. Overgrazing has left the land barren, disrupting the ecological balance and posing a threat to several species, including the greater sage-grouse. Should current wild horse and burro population levels continue to grow at current rates, projections indicate sage-grouse populations will be reduced by 70%.

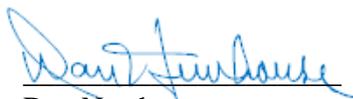
By issuing the intent to amend land management plans for greater sage-grouse, while simultaneously resuming the evaluation of a proposed mineral withdrawal of public lands in sagebrush focal areas, it is clear BLM aims to use a potential Endangered Species Act listing as an excuse to ban the responsible development of domestic minerals and energy resources on public lands.

Unilaterally locking up 10 million acres ignores the scientific community, and it fails to empower local management efforts that ensure multiple-use is afforded to rural communities. Domestic minerals are a public good, and restricting mineral development conflicts with the goals of the Administration to increase renewable energy sources into our nation's energy portfolio. Additionally, our rural communities rely on the jobs, products, and revenues that mineral production on public lands provides.

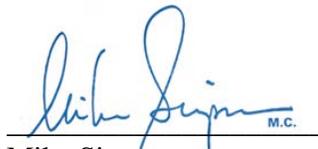
We are concerned that these actions by the Administration will further exacerbate our current energy shortages and supply chain issues – while doing little to nothing to protect and restore greater sage-grouse populations. Instead of a top-down approach, we urge you to empower states, local governments, and private conservation partners who have implemented conservation plans that establish responsible management constraints and limits on hunting, control non-native predators, reduce invasive juniper trees and grasses, and implement habitat restoration after energy development, all of which provide co-benefits for wildlife mitigation. To ensure the Department's actions are informed by the valuable local knowledge possessed by these stakeholders, the Department must meet directly with impacted state and local governments, as well as the private conservation partners who have made significant investments in sage grouse recovery, and host public meetings in all of the impacted states as part of its review.

We appreciate your attention to this matter, and we look forward to working with you on this important issue for the West.

Sincerely,



Dan Newhouse
Member of Congress



Mike Simpson
Member of Congress

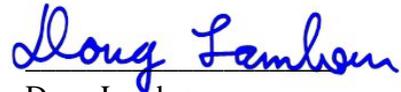


Bruce Westerman
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² Coates, Peter, *Sage Grouse Population Dynamics are Adversely Affected by Overabundant Feral Horses*, The Journal of Wildlife Management.



Tom Emmer
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Doug Lamborn
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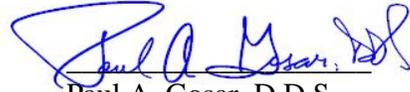
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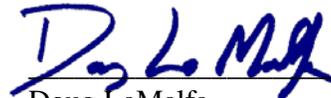
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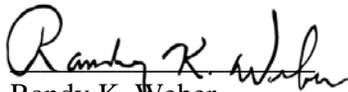
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