



January 8, 2016

BLM Director Neil Kornze
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Via email to sagebrush_withdrawals@blm.gov

Dear Director Kornze:

The undersigned organizations support the proposed withdrawal of federal mineral estate proposed to protect key habitats for the greater sage grouse, and urge federal agencies to expand the withdrawal in areal extent and scope. This action is necessary to provide full protection to the most important sage grouse habitats from future impacts resulting from the conveyance of additional valid mineral development rights. The Secretary of Interior (“Secretary”) should fully exercise her authority to withdraw federally-owned minerals from locatable entry, all forms of leasing, and also mineral materials sales. The mineral withdrawal should be executed to achieve maximum consistency with their recommendations of the BLM National Technical Team (2011, Attachment 1), the U.S. Fish and Wildlife Service Conservation Objectives Team (2013, Attachment 2), and the recommendations of the U.S. Fish and Wildlife Service Director in his memo to the BLM of October 27, 2014 (Attachment 3). In order to achieve this level of consistency and thoroughness, the Secretary should adopt and implement withdrawals in the full scope of the comments that follows. The recommendations contained in these comments are fully implementable under the law and fully reasonable in their consistency with the best available science and the on-record recommendations of federal agencies, and therefore must be considered fully and in detail in the forthcoming NEPA analysis for the proposed mineral withdrawal in order to satisfy NEPA ‘range of alternatives’ obligations.

The scope of the withdrawal should be expanded to include all minerals

As discussed below, development of locatable minerals is only one, and far from the most serious, of the threats to greater sage grouse and its habitat. BLM should withdraw all priority areas for sage-grouse conservation not only from the General Mining law of 1872, but also from the general land laws governing leasable minerals, including the Mineral Leasing Act of 1920, and also cover disposal under the Materials Act of 1947. The BLM’s National Technical Team (2011) conducted an expert review of the available science, and concluded, “There is strong evidence from the literature to support that surface–disturbing energy or mineral development within priority sage–grouse habitats is not consistent with a goal to maintain or increase populations or distribution.” *See* Attachment 1. The Secretary of Interior has full authority to

withdraw the public lands not only from locatable mineral entry, but also from fluid mineral leasing, non-energy minerals leasing, mineral materials sales, and coal leasing. Section 204 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. § 1714) provides that “the Secretary is authorized to make, modify, extend, or revoke withdrawals” of public lands. “withholding an area of Federal land from settlement, sale, location, or entry, under some or all of the general land laws, for the purpose of limiting activities under those laws in order to maintain other public values in the area or reserving the area for a particular public purpose or program.”¹ Although “leasing” is not mentioned in FLPMA’s definition of “withdrawal,” the courts, analyzing the use of “withdrawal” in other statutes and the structure and goals of FLPMA, have concluded that “[i]t would be unreasonable to hold that the emergency withdrawal contemplated by section 204(e) was not intended to give the congressional committees and the Secretary the power to preserve these values by withdrawing the land from disposition under the mineral leasing laws.”² This interpretation is further supported by the Secretary’s pre-FLPMA authority to withdraw minerals from not just location and patenting but also leasing under the Mineral Leasing Act.³

FLPMA plainly authorizes the Secretary to withdraw public land from the operation of any or all of the “general land laws: – not only the General Mining Law but also the Mineral Leasing Act.”⁴ The Secretary should exercise this authority to protect these sage grouse habitats of elevated significance from all types of future mineral development; the sage grouse habitats protected from hard-rock mining will be worth nothing to the conservation and recovery of these birds if they are subsequently converted into oil and gas fields, gravel pits, or potash mines.

Hard-rock mining can have significant negative impacts on sage grouse. This is perhaps best illustrated by the construction of the Lost Creek In Situ Uranium Mine, which was built in 2012. Several leks were within two miles of this facility, and the main haul roads running east and west of the mine site passed within one mile of two leks or lek complexes. All of the leks within two miles of the mine site have experienced major population declines since the onsite of mine construction, and these declines have continued over the past two years even as sage grouse leks

¹ 43 U.S.C. § 1702(j).

² *Pacific Legal Foundation v. Watt*, 529 F.Supp. 982, 995 (D. Mont. 1981). *Pacific Legal Foundation’s* holding on Congressional termination of withdrawals is no longer good law, see *INS v. Chadha*, 462 U.S. 919 (1983) (Constitution prohibits Congress from bypassing separation of powers); *Yount v. Salazar*, 933 F. Supp.2d 1215 (D. Ariz. 2013) (holding Section 204(c) of FLPMA’s legislative veto, which provided that Congress could block withdrawals in excess of 5,000 acres through resolution of both houses, unconstitutional), but its reasoning on inclusion of mineral leasing remains persuasive.

³ See *Mecham v. Udall*, 369 F.2d 1, 2-3 (10th Cir. 1966) (holding that enactment of Mineral Leasing Act did not exclude leasable minerals from prior executive withdrawal authority); *United States v. Midwest Oil Co.*, 236 U.S. 459 (upholding pre-MLA authority to withdraw oil and gas) (1915)

⁴ See *Mecham v. Udall*, 369 F.2d 1, 2-3 (10th Cir. 1966) (holding that enactment of Mineral Leasing Act did not exclude leasable minerals from prior executive withdrawal authority); *United States v. Midwest Oil Co.*, 236 U.S. 459 (upholding pre-MLA authority to withdraw oil and gas) (1915)

throughout Wyoming have experienced a significant population rebound. These impacts are catalogued in detail in Attachment 4.

The BLM's National Technical Team (2011:24) recommended for locatable minerals in all priority habitats that the BLM "[p]ropose withdrawal from mineral entry based on risk to the sage-grouse and its habitat from conflicting locatable mineral potential and development." To the extent that the lands proposed for withdrawal represent a minority of the lands designated as Priority Habitat Management Areas in the federal sage grouse planning process, the proposed mineral withdrawal from locatable mineral entry is consistent with the agency's own expert recommendations for these lands.

Oil and gas development is arguably having the greatest impact on sage grouse populations of any human-caused stressor in the Rocky Mountain region. This type of industrial development fragments and degrades sage grouse habitat and displaces sage grouse from key habitat areas, resulting in heavy impacts to sage-grouse populations have been documented where these stipulations have been applied (Holloran 2005, Walker et al. 2007, Walker 2008, Doherty et al. 2008, Holloran et al. 2007, Holloran et al. 2010, Holloran et al. 2015). The BLM's National Technical Team (2011:22) recommended that the agency "[c]lose priority sage-grouse habitat areas to fluid mineral leasing" under both of its recommended scenarios. Withdrawing the lands in question from future oil and gas leasing satisfies this biological imperative.

Braun (1986) and Remington and Braun (1991) documented significant impacts from coal mine-related activities on sage grouse populations. In addition, underground coal mining comes with the necessity of ventilator fans, which typically emit levels of constant noise that exceed thresholds causing significant impacts to sage grouse. *See* Attachment 5. For coal development in priority habitats, the BLM's National Technical Team (2011:24) recommended, "Find unsuitable all surface mining of coal under the criteria set forth in 43 CFR 3461.5," and for underground mining, "Grant no new mining leases unless all surface disturbances (appurtenant facilities) are placed outside of the priority sage-grouse habitat area." Withdrawing the lands in question from future coal leasing protects these important sage grouse habitats from the same impacts as would be expected under locatable minerals development.

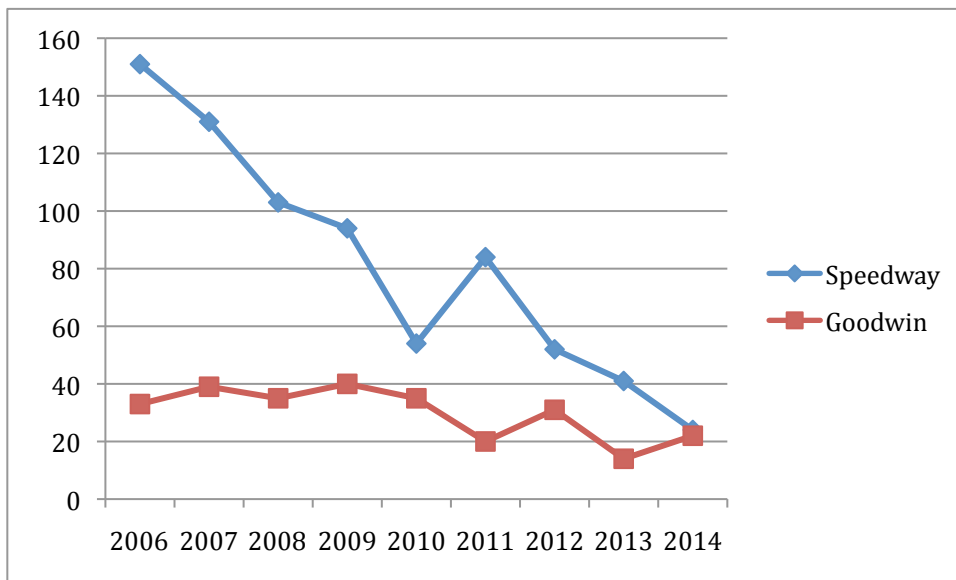
Non-energy leasable minerals include leases to permit mining for potash, sodium, phosphate, sulfur, and gilsonite. The BLM's National Technical Team (2011:25) made the following recommendations for management of these mineral resources in priority sage grouse habitats:

Close priority habitat to non-energy leasable mineral leasing. This includes not permitting any new leases to expand an existing mine.

The mining of these minerals can occur in the form of strip-mining or underground mining, just like locatable minerals, and the impacts to sage grouse and their habitats are no different as a result of the different minerals targeted for extraction. These sensitive habitats should therefore also be withdrawn from future non-energy mineral leasing as well.

Sand and gravel pits are regulated under the auspices of mineral materials sales. Their extraction involves strip mining on a small scale and involves the surface disturbance, heavy machinery,

noise, vehicle traffic, and human activity that impact greater sage grouse known to impact sage grouse distribution and habitat use and degrade sage grouse habitat quality. These problems are illustrated by the McMurry gravel pit permitted near Boulder, Wyoming. Mining began in 2008 as a pit less than 10 acres, with mining continuing through 2009. Despite exceeding the 5% disturbance cap for the Goodwin lek and having main haul roads with over 300 truck trips per day over one 3-month period on a road located within ¼ mile of the Goodwin lek, and the Speedway lek is even closer to the road (in violation of the state’s 1.9-mile restriction on such roads), the State of Wyoming permitted a new and expanded gravel mine at this site. This radically larger operation includes 335-acre permitted pit with a limit of 32 acres actively being mined at any one time, approved on July 11, 2013; an alternative to use access roads farther than 2 miles from the sage grouse leks in question was ignored. According to the testimony of Mary Flanderka of the Wyoming Game and Fish Department before the state Environmental Quality Council, "there would be no declines in sage grouse populations, provided [McMurry] compl[ies] with [its] worksheet and the way that the permit was applied for." But even the much smaller, previously permitted gravel pit in this location appears to have caused a significant decline of birds on neighboring leks, based on State of Wyoming lek counts:



This disappointing episode of state officials ignoring their own sage grouse protection measures in their haste to approve industrial projects that can reasonably be assumed to have major negative impacts on sage grouse populations provides one more indicator of why it is imperative to include mineral material sales (indeed, all forms of mineral development) in the withdrawal.

Importantly, the withdrawal of federal mineral estate should be undertaken not only for minerals underlying federally-owned surface estate, but also for all federal minerals underlying state or private lands. According to the recommendations of the National Technical Team (2011:25), “Where the federal government owns the mineral estate, and the surface is non-federal ownership, apply the conservation measures applied on public lands.”

All Priority Areas for Conservation should be included in the withdrawal

The U.S. Fish and Wildlife Service's Conservation Objectives Team identified Priority Areas for Conservation (PACs) as "highly important for long term viability of the species and should be a primary focus for our collective conservation efforts" (COT 2013). This Service effort to map the most important habitats and identify the most important threats region-by-region fulfills the National Technical Team (2011) identified need to identify priority habitats. As noted above, the National Technical Team recommended that all priority habitats (not just a subset) be closed to future mineral location, leasing, and sales. Because many of the priority habitats identified as PACs were excluded from Priority Habitat Management Area status in the recently completed federal planning process (as detailed in Attachment 6), we exhort the Department of Interior to include the withdrawal of all Priority Areas for Conservation from future mineral location, leasing, and withdrawal of all kinds, for the reasons set forth in these comments.

All USFWS-proposed 'stronghold' areas should be included in the withdrawal

In October of 2014, the U.S. Fish and Wildlife Service identified approximately 12 million acres of "stronghold" areas that possess some of the highest sage grouse densities remaining. *See* Attachment 3. These lands were identified by the Service as "a subset of priority habitat most vital to the species [*sic*] persistence, within which we recommend the strongest level of protection." We agree with the Service memo noting that "[s]trong, durable, and meaningful protection of federally administered lands in [Sagebrush Focal Areas] will provide additional certainty and help obtain confidence for long-term sage-grouse persistence." Most of these were subsequently designated as Sagebrush Focal Areas under the greater sage grouse plan amendments and revisions, but a major acreage of "stronghold" areas was not designated as SFA under the plans, and some of the acreage that indeed did become SFA has not been proposed for mineral withdrawal under the Interior Department's proposal. There is no circumstance under which it is appropriate to exclude lands from the mineral withdrawal that were designated either as "stronghold" areas by the U.S. Fish and Wildlife Service or as SFAs under the BLM planning process; all of the aforementioned categories of top-concern sage grouse habitats need to be withdrawn from future mineral location and development.

WildEarth Guardians has undertaken a GIS-based analysis comparing the acreage of land under all ownerships falling within the "stronghold" areas to those that were designated as Sagebrush Focal Areas under the plans, and found that some 3.3 million acres of sage grouse habitats of all ownerships had been excluded from the boundaries of SFAs designated by the BLM. *See* Attachment 6. All of these excluded lands and minerals should also be withdrawn from future location, leasing, or sale.

Federal lands and minerals administered under different agencies or authorities that fall within the bounds of sage grouse "strongholds" identified by the Service should also be fully included in the proposed mineral withdrawal. These include Craters of the Moon National Monument and Preserve in Idaho, Charles M. Russell and UL Bend National Wildlife Refuges and the UL Bend Wilderness in Montana, Sheldon National Wildlife Refuge in Nevada, Hart Mountain Antelope Refuge in Oregon, and the Seedskadee and Cokeville Meadows National Wildlife Refuges in Wyoming. Some of these lands were explicitly included in "stronghold" maps (*see* Attachment 3) and many were referenced by name as anchors for the protective designation as recommended by the Service in their October 27, 2014 memorandum. These lands are already managed for

conservation as a primary mission, so withdrawal of the federal minerals that underlie them should be non-controversial and should assist the managing agencies in better achieving their conservation missions.

Because the Lander Resource Management Plan was finalized before the U.S. Fish and Wildlife Service made its ‘stronghold’ recommendations, no Sagebrush Focal Areas were designated for elevated protection in the greater sage grouse plan amendment process, and no federal minerals in the Lander BLM Field Office have been proposed for withdrawal according to the agency’s published maps. USFWS-proposed “stronghold” habitats in the Lander Field Office face major threats from uranium mining and oil and gas development, as well as lesser threats from jade prospecting and mining and sand and gravel pit development. This area is the heart of the sage grouse range, and merits the strongest degree of protection from mineral development.

In Wyoming, the proposed withdrawal also excludes the designated Sagebrush Focal Areas that are at the greatest risk of destruction and degradation due to hard-rock mining and other types of mineral development. Uranium mining is underway in the Greater South Pass PHMA, which also has been designated as a Sagebrush Focal Area, with mines under development in the Sheep Mountain and Lost Creek areas south of Green Mountain, and also in the Gas Hills area, a part of the Sagebrush Focal Area that has seen considerable uranium exploration and mining in decades past. These lands are unaccountably excluded from the proposed mineral withdrawal. Portions of the South Pass Historic Landscape, designated for elevated protection by the BLM, are SFA lands excluded from the proposed mineral withdrawal, and have been subject to gold prospecting and speculation in recent years. The Upper Green River Valley, which has experienced intensive oil and gas development and associated gravel mining to support thousands of miles of gravel road construction, also is excluded from the SFA mineral withdrawals. These sensitive sage grouse habitats must all be withdrawn from future mineral entry. In total, hardly any of the Sagebrush Focal Areas designated for Wyoming are included in the proposed mineral withdrawal, a slap in the face of sage grouse conservation given that almost 40% of the remaining sage grouse live in Wyoming, a state facing some of the most severe threats from the minerals industry. Excluding from protection the very Sagebrush Focal Areas that are at the greatest risk of mineral development makes a mockery of the agency’s effort to protect the most important sage grouse habitats.

Additional areas of high sage grouse population concentration beyond SFAs should be included in the withdrawal

We are dismayed that many areas of predominantly federal land with high sage grouse population densities and high-quality habitat have been excluded from the current SFA designations. The Interior Department should recalibrate and add these important areas for sage grouse as additional lands withdrawn from mineral development as discussed below. All lands where strong sage-grouse populations are imminently threatened by incompatible land uses must also be included in withdrawals, including Parker Mountain in Utah; the Powder River Basin, Laramie Plains, and Jackson Hole in Wyoming; the Arapaho National Wildlife Refuge and surrounding lands in northwestern Colorado; and all sage grouse habitats in the Dakotas should receive mineral withdrawals.

We are also concerned with the limited geographic scope of the identified SFAs, and urge you to

revisit and expand these areas to ensure that adequate sage grouse protections extend to the areas necessary for sage grouse survival and recovery. For example, we recommend expanding the spatial extent of mineral withdrawals beyond SFAs to include isolated population areas at greatest risk of extirpation (e.g., southern Utah, Laramie Basin, Jackson Hole, Powder River Basin, Dakotas). Of course, protecting the most at-risk populations is essential to maintain genetic distinctness and population connectivity, and to maximize the potential for the survival of the species.

We are also concerned that the Service and BLM have delineated “stronghold” areas and SFAs, respectively, based on sage grouse population densities as mapped in a 2004 study, even though this study is now badly outdated and supplanted by more recent and robust population analyses.

In light of these limitations in the Service’s initial “stronghold” delineations, we have undertaken a more vigorous analysis of existing sage grouse populations and habitat, and have identified supplemental stronghold areas in need of designation and mineral withdrawal. We have based our supplemental boundaries (see map, Attachment 7) on more current and more detailed population density mapping (Doherty et al. 2010), which represents the best available science on sage grouse population densities.

The federal agencies should also undertake consultation with tribal nations to determine whether they would like to see reservation lands to be withdrawn from mineral availability as part of this mineral withdrawal. Reservations that appear to qualify as Sagebrush Focal Areas but for their land ownership and management status as reservations might include all or portions of the Duck Valley, Fort McDermitt, Wind River, and Fort Belknap reservations. If tribal authorities are favorably inclined toward such a withdrawal, it should be included as part of this sage grouse conservation package.

All occupied habitats for the Bi-State/Mono Basin and Columbia Basin Sage Grouse populations should be included in the withdrawal

Sage grouse occupied habitats in the Columbia Basin (Washington) population and the Mono Basin (Bi-State) population fell outside the scope of Sagebrush Focal Area designations under greater sage grouse RMP amendments, as well as the Service’s “stronghold” recommendations. These populations are so small and their survival is so tenuous that all occupied and potential habitats associated with their populations should be added to the mineral withdrawals already proposed by the Interior Department.

The Columbia Basin sage grouse population is restricted to as many as four populations divided by an interstate highway and multiple transmission lines (two populations to the north, two to the south, WHCWG 2010), with limited connectivity and dispersal between them (Shirk et al. 2015). Each of these populations occupies highly fragmented habitats (*see, e.g.*, Schroeder and Robb 2003). By 1996, more than half of Washington’s shrubsteppe habitat has been lost to agricultural conversion, and that which remains is heavily fragmented (Dobler et al. 1996). As a result, sage grouse have decreased to approximately 8% of their original occupied range (Schroeder et al. 2000). As of 2011, the Washington statewide population of greater sage grouse was estimated at 1165 birds (WHCWG 2012). According to Stinson et al. (2004: 22),

The two remaining populations in Washington are too small to be considered viable, so the persistence of sage-grouse in Washington is likely to depend on recovery efforts. Small populations are affected by loss of genetic variability, inbreeding, and predation pressure, and are at risk from random events such as extreme weather or fires.

Clearly, the withdrawal of occupied and potential habitats of the Columbia Basin sage grouse population would remove a potential threat to this population's survival.

The Bi-State Distinct Population Segment of greater sage grouse occupies the Mono Basin and surrounding habitats, which are isolated from the rest of the sage grouse populations in the range. Populations in the six Population Management Units ("PMUs") are uniformly low, with trends that are stable or decreasing (Bi-State TAC 2012). Four of the six PMUs have populations that are in immediate threat of extirpation within the next 30 years. Coates et al. (2014) found that trends in males counted per lek for the Bi-State populations have been relatively stable since 2003, but this analysis excluded Population Management Units with the steepest declines and sparsest grouse populations. Aldridge et al. (2008) found that the single greatest factor predicting sage grouse extirpation was human population density in 1950, and that counties with population densities greater than 4 people per square kilometer had increased likelihood of extirpation. Sage grouse habitats in the Bi-State area face some of the most extensive threats from exurban development in the species' range. Roads and associated habitat fragmentation are also a major threat. According to USFWS (2013:42),

Our analysis of the best available data in the Bi-State area documents that all known leks are within 3 km (1.8 mi) or less of an existing road and between 35 and 45 percent of annually-occupied leks are within 5 km (3.1 mi) of highways (Service 2013, unpublished data).

USFWS (2013) correctly notes that hard-rock mining was extensive across much of the Bi-State area during the 1800s, and that current claims and mining activity are ongoing. For the Mount Grant PMU, the Bi-State TAC (2012: 36) pointed out,

On-going mining and potential geothermal development pose relatively high risks in the Mount Grant PMU. Existing activities associated with the current ore processing facility at Aurora have already contributed to the development of additional transmission lines and increased vehicle traffic in portions of the PMU that are important to sage-grouse.

The vast areal extent of existing claims, and the lack of a regulatory mechanism to reduce their number and extent, mean that this principal threat to sage grouse persistence will go unameliorated by current sage grouse protections. The pending Bi-State Forest Plan and associated BLM Carson City plan amendment are extremely weak in applying protections to hard-rock mining operations. Withdrawing all areas within identified sage grouse habitat from mineral entry is therefore necessary to address the weaknesses in current and pending sage grouse protections for this population.


Conclusions

We support a mineral withdrawal for important sage grouse habitats that is as strong, comprehensive, and geographically extensive as is necessary to guarantee the maintenance and recovery of sage grouse in the most densely occupied remaining habitats. In order to fully come into compliance with the recommendations of the BLM's own National Technical Team (2011), the mineral withdrawal should apply to all forms of mineral location, leasing, and sales. The scope of the mineral withdrawal should not be limited to the 10 million acres proposed in the Federal Register notice, but should be expanded to include all Priority Areas for Conservation identified by COT (2013), all "stronghold" areas identified by the U.S. Fish and Wildlife Service in its memorandum to the BLM of October 27, 2014, and all Sagebrush Focal Areas designated under the federal planning effort. The withdrawal should encompass all forms of federal mineral location, leasing, and sales, and not be limited to locatable minerals only.

In addition, federal agencies should require that all existing federal mining claims and mineral leases falling within the boundaries of the proposed mineral withdrawal be examined for validity before permitting any surface-disturbing activity to occur on them, as part of this decision-making process. There is little doubt that many mining claims and mineral leases in the important sage grouse habitats in question have not had the due diligence performed by their respective holders to maintain them in a legally valid state. Such legally invalid claims and leases should be eliminated from existence.

Thank you for the opportunity to share our concerns, and please keep us informed of any future developments regarding this withdrawal procedure.

Respectfully yours,



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List of Attachments:

1. BLM National Technical Team report
2. USFWS Conservation Objectives Team report
3. Memorandum of October 27, 2014 from USFWS to BLM regarding “stronghold” areas
4. Sage grouse conservation efforts and population trends: A Wyoming case study
5. Ambrose (2015) – Review of Greens Hollow Sound Study
6. The shrinking geography of sage grouse conservation
7. Mapped recommendations for expanded mineral withdrawals

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