

**National Audubon Society • The Nature Conservancy
National Wildlife Federation • Backcountry Hunters and Anglers
North American Grouse Partnership • Nevada Wildlife Federation
Colorado Wildlife Federation • Montana Audubon • Wyoming Outdoor Council**

October 3, 2025

Submitted via eplanning (<https://eplanning.blm.gov/eplanning-ui/project/2016719/510>)

Bureau of Land Management
BLM Anchorage District Office
Attn: Stephanie Rice
4700 BLM Road
Anchorage, AK 99507

**Re: Comments on Proposed Changes to the 2024 Greater Sage-grouse Proposed
Resource Management Plan Amendments**

Please accept and fully consider these comments on behalf of National Audubon Society, The Nature Conservancy, National Wildlife Federation, Backcountry Hunters and Anglers, North American Grouse Partnership, Nevada Wildlife Federation, Colorado Wildlife Federation, Montana Audubon, and Wyoming Outdoor Council. Our nine organizations and members are deeply invested in sound stewardship of our public lands. We have been involved in Greater Sage-grouse (GRSG) conservation for many years, not only in the 2015 and 2019 planning processes, but also in the planning efforts to date including at the state-level.

I. OVERVIEW AND EXECUTIVE SUMMARY

The outlook for GRSG is incredibly concerning, not only in regard to the continued existence of the species but for what its 80% decline since 1965 represents for the biologically, economically, and culturally important sagebrush ecosystem. Since 2001, over 20 million acres of sagebrush (an area the size of Maine) have transitioned to a degraded status and are no longer classified as intact sagebrush habitat.¹ Given continued declines in high quality sagebrush areas and ecological integrity, it is no surprise that GRSG populations are continuing to decline. The announcement of extirpation of GRSG in North Dakota earlier this year is further evidence that meaningful habitat management is needed, as the bird's decline flags habitat concerns for other high-profile wildlife species (mule deer and pronghorn), industries that also depend on healthy sagebrush country (ranching, recreation, etc.), as well as quality of life in communities that are feeling the direct impact of reduced air quality and threats to life caused by increasing size and frequency of wildfires in rangelands.

We recognize the important role that the Bureau of Land Management (BLM) plays as the primary land management steward for GRSG habitat, especially in light of the U.S. Fish and Wildlife Service's (USFWS) March 2010 "warranted, but precluded" finding that identified the loss of habitat

¹ Remington, T.E., et al. 2024. *Sagebrush Conservation Strategy, Part II: Strategies for Sagebrush Conservation*. Western Association of Fish and Wildlife Agencies, Boise, Idaho. 168pp.
<https://wafwa.org/wp-content/uploads/2025/09/Sagebrush-Conservation-Strategy-Part-II.pdf>

and inadequacy of regulatory mechanisms as significant threats to the species². We also acknowledge that the 2015 BLM Resource Management Plan Amendments (RMPAs) were integral to the USFWS's 2015 determination that listing GRSG under the Endangered Species Act (ESA) was not warranted³.

We hope that this current attempt at developing RMPAs and records of decision (RODs) for GRSG conservation across Idaho, Montana / Dakotas, Nevada / California, Utah and Wyoming will not only result in plans that reverse recent declines in GRSG population in a manner that ensures the species continues not to warrant listing as a threatened or endangered species, but also protects intact landscapes, achieves consistency across the species' range, and proves durable. Sound and defensible GRSG habitat management plans will also benefit many western communities, industries and wildlife that also depend on healthy sagebrush lands and waters.

Our organizations support making changes to the rangewide management plans that are scientifically defensible, such that management actions are based on the best available science. The management actions – *including recently proposed changes* – should focus on improving habitat conditions and minimizing new surface disturbances, which were two pillars of the 2015 plans that were recommended by scientists to prevent further declines of GRSG populations and thus avoid the necessity for federal protection under the ESA. Also, for defensibility, the remaining plans need to line up with Colorado and Oregon's completed plans for consistency across the species' range. BLM's stated purpose for this planning process is "to amend certain goals, objectives, allocations, and management direction for GRSG management in its RMPs to respond to updated scientific information and changing land uses and **provide for consistent and effective rangewide conservation based on biological information** that is responsive to locally relevant habitat variability" [emphasis added].⁴ BLM's commitment to implement and enforce these plans is particularly important, because, explained below, the 2015 plans were never fully implemented as intended.

The remainder of our comments go into greater detail about specific proposed changes outlined in the September 2025 document, *Greater Sage-grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah and Wyoming* (Proposed Changes). We identify necessary improvements to help BLM achieve its goal of enhancing conservation for the benefit of GRSG while allowing for continued multiple use on BLM-managed lands. These improvements are needed to make the plans defensible and ultimately successful. Specifically, our recommended improvements include:

- **Address Changes to Federal Laws and Regulations:** The passage of the One Big Beautiful Bill Act (OBBBA) and resulting changes to federal oil and gas regulations, as well as recent changes to National Environmental Policy Act (NEPA) regulations, have significantly altered BLM policies and procedures. BLM's planning process pre-dates these major legislative and regulatory changes and BLM must account for those changes in its proposed plan amendments. Given the public interest, community insight, and complexity of this issue,

² 75 Fed. Reg. 13,910 (23 March 2010)

³ 80 Fed. Reg. 59,858 (2 October 2015)

⁴ Bureau of Land Management. 2024. *Greater Sage-Grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

BLM should make commitments in the RODs to at least a 30-day public comment period for all project-level NEPA associated with implementation of these plans as this is the minimum needed for these plans to be defensible and effective.

- **Address Lack of Sufficient Information for Public Comment:** The Proposed Changes document does not provide sufficiently detailed information to enable public understanding of the actions and the impacts, preventing meaningful engagement as is required under NEPA.⁵
- **Ensure Effective Adaptive Management:** Consistent application of science-based adaptive management across the range is essential to ensure that BLM's efforts are effective and legally defensible. Where details are still outstanding, BLM should provide additional specificity and analysis of impacts prior to approving the RODs and, where necessary, make commitments in the RODs to continue to develop a detailed adaptive management approach with processes and timelines that are consistent rangewide. Further, BLM should make commitments in the RODs to make detailed adaptive management measures available for public review and comment, and to ensure at least 30-days public comment on all project-level NEPA decisions associated with adaptive management of these plans, in order to ensure the plans function as intended.
- **Ensure Priority Habitat is Able to Sustain GRSG:** The areas previously identified as Priority Habitat Management Areas with limited exceptions (PHMA+) contain some of the best-of-the-best remaining GRSG habitat. Loss of additional protections for these areas known for their healthy, intact habitat and importance to GRSG populations highlights the uncertainty around whether BLM will be able to adequately conserve these habitats to sustain GRSG populations. BLM must make commitments in the RODs to ensure the measures in the plans are implemented as intended in Priority Habitat, to include giving careful consideration to any exceptions and granting them only in rare circumstances.
- **Address Lack of Sufficient Information for Habitat Designations and Land Disposal in Utah:** There is insufficient information about the proposed changes to substantial acreages and management prescriptions of GRSG habitat in Utah (affects all categories of habitat). Among the missing components are clear justification for changes and analyses of impacts to GRSG populations and lands identified for disposal.
- **Site Major Rights of Way (ROWs) Outside of Habitat:** Opening General Habitat Management Areas (GHMA) to Major ROWs (for transmission lines, pipelines, roads, or solar / wind facilities) in Nevada is not sufficiently explained or supported. Major ROWs can and should be sited outside of Priority and General Habitat.

This planning process – the third for GRSG since 2015 – comes at an incredibly important time. The 2015 RMPAs, although accomplishing the important goal of avoiding the listing of GRSG as threatened or endangered under the ESA, were never fully implemented as intended. BLM's subsequent attempt to open the plans and make them more agreeable to states did not withstand judicial scrutiny. Meanwhile, the bird continues to decline, as does large swaths of the sagebrush ecosystem, with 1.3 million acres of functioning lands being lost annually. We urge BLM to address remaining concerns and conclude this planning process, issuing sound and defensible management plans so that resources can shift from planning to implementation.

⁵ U.S. Department of the Interior. *Handbook of National Environmental Policy Act Implementing Procedures*. 516 DM 1. <https://www.doi.gov/media/document/doi-nepa-handbook>

II. **RECOMMENDATION: ADDRESS CHANGES TO FEDERAL LAWS & REGULATIONS**

As requested by BLM, we are providing comments on its Proposed Changes. We also address two new substantial developments that arose in recent months which are important for BLM to consider in this planning process. Among the reasons for “modifying elements of the Proposed RMPA’s” is to ensure that the plans comply with current policy. The passage of the FY26 Budget Reconciliation Bill (One Big Beautiful Bill Act, or OBBBA)⁶ considerably changes federal oil and gas policies and procedures.⁷ In addition, the U.S. Department of Interior (DOI) and BLM have recently made substantial changes to long-standing NEPA practices, such as the overhaul of DOI’s NEPA regulations.

The OBBBA requires numerous changes to BLM processes, with the intent of promoting U.S. energy production. The OBBBA significantly reduces BLM’s discretion related to oil and gas leasing, and the agency must consider how these changes affect the analyses done to date of anticipated future impacts of proposed actions. These changes include, but are not limited to the following:

- The new statutory changes require BLM to make available industry-nominated lands for lease within 18-months and quarterly lease sales are required in the five states that still support GRSG (Wyoming, Colorado, Utah, Montana, Nevada). This significantly limits BLM’s long-standing discretionary authority enabling field offices to take into consideration local knowledge of changes to sensitive ecosystems and wildlife habitats, as well as timely information provided by state wildlife agencies, when determining which parcels to advance for leasing.
- BLM is no longer allowed to add new restrictions to oil and gas leases outside of the terms included in relevant resource management plans, which will constrain the agency’s ability to respond to changed circumstances and avoid impacts to GRSG habitat.

Given the intent of the foundational 2015 RMPA efforts to minimize new surface disturbances, especially in regard to oil and gas development, because of the robust scientific determination that the loss of habitat and human activity associated with it cause population-level impacts to GRSG, BLM must give due consideration to how these new provisions governing oil and gas leasing may change the impacts of this action. The management actions specified in the 2024 proposed plans and these 2025 changes – such as habitat changes – should be re-examined in light of these significant process changes to ensure that the management actions proposed can actually be implemented.

In addition, DOI and BLM have recently made substantial changes to long-standing NEPA practices, such as the DOI’s recent overhaul of its NEPA regulations and procedures⁸ and the

⁶ Bureau of Land Management. 22 July 2025. *Interior advances energy dominance through the One Big Beautiful Bill Act*. <https://www.blm.gov/press-release/interior-advances-energy-dominance-through-one-big-beautiful-bill-act>

⁷ Pub. Law 119-21, 139 Stat. 72. 4 July 2025. <https://www.congress.gov/bill/119th-congress/house-bill/1/text>

⁸ U. S. Department of the Interior. 2025. *New Department of the Interior NEPA Procedures*. <https://www.doi.gov/oepe/national-environmental-policy-act-nepa>

proposed use of energy emergency provisions to rapidly approve projects.⁹ Given the reliance of plan implementation on project-level NEPA in particular, BLM should consider whether an additional look at plan implementation provisions is warranted in further analysis, and if current provisions are no longer adequate to ensure processes continue to function as intended, BLM should revise them accordingly.

BLM should also make commitments in the RODs to ensure that meaningful analysis and opportunity for appropriate public, local, State and Tribal government evaluation and comment will be maintained during plan implementation given recent changes to NEPA regulations and practices. In DOI's new NEPA regulations, DOI maintains discretion to make commitments to public involvement over and above the NEPA's requirements.¹⁰ Given the public interest, community insight, and complexity of this issue, BLM should make commitments in the RODs to at least a 30-day public comment period for all project-level NEPA processes associated with these plans in order to address any vulnerabilities that are being created by relying on case-by-case evaluation of proposed activities and exceptions.

These substantial developments occurred in the summer of 2025, after the analysis was conducted for the 2024 Draft RMPAs/EIS and Final EIS, and after the close of the periods for submitting comments and administrative protests on the Proposed GRSG RMP Amendment. Therefore, we could not have raised these matters earlier. Both developments, however, represent "an important aspect of the problem" BLM faces with the proposed RMPs.¹¹ We raise this new information now so BLM has an opportunity to consider it in reaching a final decision for this planning process.

III. RECOMMENDATION: ADDRESS LACK OF SUFFICIENT INFORMATION FOR PUBLIC COMMENT

BLM identifies the proposed changes under consideration for the management of GRSG habitat across eight Western states as being "significant."¹² The Proposed Changes document states: "BLM has carefully reviewed each of these proposed changes to determine if they would result in significant effects outside the range of effects analyzed in the Proposed RMPA/Final Environmental Impact Statement (EIS). BLM has determined that the analysis described in the Proposed RMPA/Final EIS is inclusive of the effects that would occur because of these changed

⁹ U.S. Department of the Interior. 23 April 2025. *Department of the Interior Implements Emergency Permitting Procedures to Strengthen Domestic Energy Supply*. <https://www.doi.gov/pressreleases/departement-interior-implements-emergency-permitting-procedures-strengthen-domestic>

¹⁰ U.S. Department of the Interior. June 2025. *DOI Handbook of NEPA Procedures. Appendix 3*. Implementation Guidance to Bureaus. <https://www.doi.gov/media/document/doi-nepa-appendix-3>

¹¹ *Motor Vehicle Manf'rs Ass'n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43. (1983)

¹² Bureau of Land Management. 15 November 2025. 2021. *Greater Sage-grouse Land Use Plan Amendments*, Documents. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

management actions and supplemental analysis under the National Environmental Policy Act is not needed.”¹³

However, BLM’s regulations state that the public shall be provided opportunities to meaningfully comment on and participate in significant changes made to plans.¹⁴

As our organizations endeavored to review the significant changes proposed, it became clear that the document broadly lacks sufficient information to enable the public to understand the changes and the potential impacts. Therefore, BLM has not provided an adequate opportunity for engagement and meaningful public comment. Specific cases where there is lack of information are described in subsequent sections.

Additionally, inadequate information related to the Governors’ Consistency Reviews is a concern. While the Appendix in the Final EIS¹⁵ details known inconsistencies between the Proposed RMPA and state plans, this captures these inconsistencies at the time of release – November 2024. Since the Consistency Reviews are named as one of two reasons why BLM is proposing these changes, failure to include details of these reviews (such as the specific letters, as has been done in other NEPA processes) makes it challenging for the public to understand the states’ concerns and specific reasons for proposed changes, especially any that have arisen since the release of the Final EIS. We recommend that BLM provide the additional requested information and analyses.

IV. RECOMMENDATION: ENSURE EFFECTIVE ADAPTIVE MANAGEMENT

Adaptive Management: Rangewide Approach

Because conditions change over time, adaptive management is an important aspect of GRSG conservation. The consistent application of science-based adaptive management across the range of the GRSG is essential to ensure the efforts of BLM are effective and *legally defensible*. A properly designed and effectively implemented adaptive management program is important to ensure BLM’s GRSG management plans are both *durable* and *effective*. Adaptive management was an important part of the 2015 GRSG RMPAs and was cited extensively by the USFWS in its decision not to list the species under the ESA.¹⁶

¹³ Bureau of Land Management. 15 November 2025. *Greater Sage-Grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. Page 1. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

¹⁴ The portion of the BLM Code of Federal Regulations focused on resource management plan approval and administrative review states the following: “Before such approval is given, there shall be public notice and opportunity for public comment on any significant change made to the proposed plan.” 43 CFR § 1610.5-1(b). In addition, the portion of the CFR related to public participation states: “The public shall be provided opportunities to meaningfully participate in and comment on the preparation of plans, amendments and related guidance and be given early notice of planning activities.”

¹⁵ Bureau of Land Management. 2025. *Appendix 23, Consistency with State and Local Land Use Plans*. https://eplanning.blm.gov/public_projects/2016719/200502020/20122962/251022942/Appendix_23_Consistency_State_Local_Land_Use_Plans_508.pdf

¹⁶ Federal Register. 2 October 2015. *12-Month Finding on a Petition to List Greater Sage-Grouse (Centrocercus urophasianus) as an Endangered or Threatened Species*. 80 Fed. Reg. 59858.

In practice, the 2015 approach to adaptive management has proven to be flawed in at least three ways. Recognizing these, the adaptive management program proposed in the 2024 Draft RMPA/EISs was intended to address all of these issues:

- First, adaptive management strategies in 2015 varied widely across the states in the range, leading to inconsistent methodologies and outcomes, making it challenging to ensure effectiveness and to develop best practices or lessons learned to improve adaptive management over time.
- Second, state agencies and state BLM offices have been inconsistent in their responses to triggers (thresholds) being met, and generally slow to come to an agreement regarding causal factors and to implement management responses (if any).
- Third, while adaptive management plans included both habitat and population triggers, the majority of triggers included and met were population triggers.^{17 18} This exacerbated the first two issues. Because GRSG populations are cyclical and can fluctuate over a fairly wide range, it proved difficult to come to definite conclusions that population-based triggers had in fact been reached, had been reached due to covered management actions, and would be successfully addressed through proposed management changes. This uncertainty enabled inaction in implementing adaptive management and likely contributed to continued GRSG population declines.

To be successful, *adaptive management analyses should be transparent and repeatable*, allowing evaluation by state wildlife agencies and the scientific community, and the identification of best practices. BLM must have some form of consistent methodology to analyze lek data and monitor population fluctuations across the range, providing repeatable and verifiable results. To achieve this, BLM proposed the use of geospatial and remote-sensed data in the 2024 Draft RMPA/EISs to assess sagebrush habitat, with additional analysis provided by state wildlife agencies. As the Draft EIS states, “[t]he BLM must consider all available information regarding population threshold status.” This includes state wildlife agency lek counts, state population trend analyses, and other state data, because state wildlife agencies have primary authority over fish and wildlife resources within their states and are responsible for managing GRSG populations.

We understand the importance of BLM working with state wildlife agencies to collect, share, and analyze population data, while also continuing to use best available science as a means of identifying adaptive management thresholds. The Targeted Annual Warning System (TAWS) can serve as a defensible and consistent model across states, while still encouraging state wildlife

<https://www.federalregister.gov/documents/2015/10/02/2015-24292/endangered-and-threatened-wildlife-and-plants-12-month-finding-on-a-petition-to-list-greater>

¹⁷ Bureau of Land Management. 2015. *Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region, Including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana Nevada and Northeastern California Oregon Utah*, Appendix D, Adaptive Management Strategy.
https://eplanning.blm.gov/public_projects/lup/103348/143737/176977/ORGRSG_AppendixD-Adaptive_Mngmnt_508.pdf

¹⁸ Bureau of Land Management. 2015. *Approved Resource Management Plan Amendment for Greater Sage-Grouse*. Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Springs Field Offices, 37-38.
https://eplanning.blm.gov/public_projects/lup/103347/143767/177179/002_Wyoming_ARMPA_Main-Body.pdf

agencies to collect and share population data and conduct their own, parallel analyses of potential changes and triggers. BLM should also use and rely on data collected and analyses prepared by state wildlife agencies both as a means of identifying thresholds and determining management responses. The 2025 Colorado and Oregon RODs and the proposed RMPA changes appear consistent with this intent.

For rangewide consistency and to meet the purpose and need of this planning process, the adaptive management framework and application outlined by BLM in the 2025 Proposed Changes must continue to line up with the approach set out in the 2025 Colorado and Oregon RODs. The proposed changes must also align with the approach taken in the 2024 Draft RMPAs if BLM intends to use the impacts analysis in the Final EIS released in 2024 to cover the proposed changes, as stated. The Draft RMPAs applied the same adaptive management framework across the GRSG's range, without variation across states, including specific triggers or thresholds for adaptive management and the methodology and timeframe for actions to be taken in response. BLM's proposed approach in the 2024 Draft RMPAs was virtually the same across alternatives 3, 4, and 5 (Preferred Alternative).

Generally, the proposed changes for the 4 plans (Idaho, Montana / Dakotas, Nevada / California, Utah) retain key elements of the approach outlined in the 2024 Draft RMPAs and the 2025 RODs, including soft and hard thresholds, use of the TAWS model as a backstop, rapid and formal causal factor analyses (CFA), provisions for responding to deactivate or reverse thresholds, and clear timelines. The proposed changes also clearly outline how BLM and states will work together to monitor and analyze habitat data and to respond to activated thresholds by implementing a response.

The outlier is Wyoming. There is currently no specific adaptive management language for Wyoming other than a reference to the state's [2019 Executive Order](#) and [Wyoming Greater Sage-Grouse Adaptive Management Plan](#). BLM does not offer any specific commitments as to how BLM will work with the state, share information, ensure consistency with the use of TAWS, address thresholds, or take management actions. The document simply states: "Once the State interagency adaptive management process is in effect, BLM will seek to incorporate the State's adaptive management process into its approved RMP."¹⁹ The information provided is insufficient for BLM to meaningfully analyze this approach to adaptive management for its forthcoming RMPA. Nor can the public effectively comment on the approach when no detail has been provided. The information provided is insufficient.

As stated above, we strongly support concluding this planning process expeditiously and moving forward with implementation to halt the decline of the species. Therefore, we support BLM approving the Wyoming plan on the same timeline as the other state plans. However, we request that BLM provide additional detail and analysis of impacts where the Wyoming may differ from other states prior to approving the ROD and, where necessary, make commitments in its ROD to continue to work with Wyoming to develop a detailed adaptive management approach with processes and timelines that are consistent with the rangewide approach. Further, we ask that BLM agree to make the detailed adaptive management measures available for public review and

¹⁹ Bureau of Land Management. 15 November 2025. *Greater Sage-Grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

comment, consistent with NEPA, the Administrative Procedure Act (APA), and BLM regulations, and to act promptly to update the adaptive management provisions of the Wyoming plan and issue a new ROD.²⁰

Adaptive Management: Authorizing Activities

Another key concern with the adaptive management process continues to be whether new authorizations for activities that could impact GRSG (such as new oil and gas wells, transmission lines or roads) would be considered during the assessment period for a threshold. The 2024 Draft RMPAs, 2025 Colorado and Oregon RODs, and September 2025 proposed RMPA changes have similar language detailing actions, analyses and exceptions that may be granted to the limitations imposed for activating a threshold. However, it is important to note that the previous 2015 and 2024 approach to adaptive management provided more clarity that new proposed activities would be limited until analysis can be completed.²¹

As an additional concern, BLM's consideration of whether to approve new authorizing activities in the 2024 Draft RMPAs, the 2025 Colorado and Oregon RODs, and the proposed changes is contingent on project-level NEPA. Project-level NEPA analysis is now the only meaningful checkpoint on whether to approve activities that could impact GRSG or habitat in areas where populations or habitat have declined to the point that thresholds have been met. Project-level NEPA that is rigorous and considers public and local knowledge will be necessary to ensure the adaptive management process functions as intended. If discretionary projects continue to be authorized with limited or no consideration as to whether or not GRSG will be impacted in situations where a population or habitat has declined to the point of meeting a threshold, the adaptive management process will be effectively meaningless.

BLM must provide some level of assurance that project-level NEPA undertaken for the purpose of adaptive management under these plans will include meaningful analysis and opportunity for appropriate public evaluation and input, to include at least 30-days for public notice and comment, public meetings and engagement. These commitments are necessary in light of the DOI's new NEPA regulations and procedures²² and proposed rapid approval of projects under energy emergency provisions.²³ Given the public interest, community insight, and complexity of this issue,

²⁰ 43 C.F.R. § 1610.5-1(b). 21 December 2017

²¹ From 2025 Proposed Changes document (p. 6): "The BLM can consider authorizing proposed new activities during a CFA if the activities will cause no GRSG mortality or direct loss or degradation of occupied GRSG habitat. After completing the CFA, the BLM can consider activity authorizations and reauthorizations if similar activities were neither causal factors nor contributing factors of the activated threshold. Project-level NEPA will evaluate if authorizing a proposed new activity could cause a threshold to be sustained or reactivated." [emphasis added]. Bureau of Land Management. 15 November 2025. *Greater Sage-Grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

²² U.S. Department of the Interior. 2025. *New Department of the Interior NEPA Procedures*. <https://www.doi.gov/oepe/national-environmental-policy-act-nepa>

²³ U.S. Department of the Interior. 23 April 2025. *Department of the Interior Implements Emergency Permitting Procedures to Strengthen Domestic Energy Supply*.

BLM should make commitments to meaningful public comment²⁴ in the Record of Decision for these plans in order to address any vulnerabilities that are being created by relying on case-by-case evaluation of proposed activities and exceptions and to ensure the adaptive management provisions work as intended.

Adaptive Management: Wildfire

Long-term persistence of GRSG will depend on both protection of intact sagebrush sites and restoration of degraded sites, including areas where connectivity has been lost. As fire regimes in the sagebrush biome across the western United States have been greatly altered due to broad-scale invasion of non-native annual grasses, climate change, and human activities,²⁵ and the GRSG is dependent on sagebrush habitat, adaptive management thresholds based on habitat area and condition – and the loss of habitat area due to wildfire – are increasingly important.

A key concern with the changes, as proposed, is whether decisions are made to declassify habitat in areas that have been affected by wildfire. As stated in the plan changes, “If the GRSG habitat assessment concludes that wildfire severity permanently precludes habitat restoration, BLM may perform additional assessments to determine if the wildfire-affected area should not be considered GRSG habitat.”²⁶ Restoration and expanding covered habitat in adjacent areas should be the first line of action following a fire. If BLM simply removes habitat from protection after each fire without attempting to ameliorate the damage caused, at least in part, the resulting continued decline of habitat and GRSG would be precipitous. Additional language should be added to the RMPAs and RODs to make clear that actions to conserve and restore additional habitat are required to be taken *before* BLM and state partners consider removing areas from habitat protections altogether.

In addition, as fires are expected to continue to be a major threat in frequency, intensity, and size, BLM should identify priority areas for sagebrush restoration. An increasing number of spatial conservation prioritization tools are being developed and used by states and partners, including

<https://www.doi.gov/pressreleases/department-interior-implements-emergency-permitting-procedures-strengthen-domestic>

²⁴ U.S. Department of the Interior. June 2025. *DOI NEPA Appendix 3*.
<https://www.doi.gov/media/document/doi-nepa-appendix-3>

²⁵ Crist, M. I., et al. 2023. *Trends, Impacts, and Cost of Catastrophic and Frequent Wildfires in the Sagebrush Biome*. *Rangeland Ecology & Management*. 89:3-19.
<https://www.sciencedirect.com/science/article/pii/S1550742423000374>

²⁶ See Habitat Thresholds due to Wildfire. Bureau of Land Management. 2024. *Greater Sage-Grouse Rangeland Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. Background. Page 1.
<https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

the Prioritizing Restoration of Sagebrush Ecosystems Tool (PReSET)^{27 28}. We encourage BLM to commit to using this or a similar tool to inform its identification of priority areas.

Adaptive Management: Conclusion

We underscore that BLM has the ultimate obligation to determine when an adaptive management threshold has been met and how it will be addressed, and to take action in a timely manner. This must be done in a way that is consistent rangewide, reflects the best available science, and aligns with the purpose of this planning process. Adaptive management was an important part of the 2015 GRSG RMPAs, which was cited extensively by the USFWS in its decision not to list the species under the ESA,²⁹ and remains a key indicator of whether this plan to conserve GRSG will succeed.

We also emphasize the outsize importance that now falls on adaptive management if BLM proceeds with the other changes as proposed which take away certainty and protections that were in place. These include limiting exceptions in certain Priority Habitat and removing substantial areas of habitat in Utah and Nevada from protections through habitat designations and management prescriptions, as discussed in more detail below.

V. RECOMMENDATION: ENSURE PRIORITY HABITAT IS MANAGED SO AS TO SUSTAIN SAGE-GROUSE POPULATIONS

In prior comments to BLM, we emphasized the efficiencies that could be gained if a subset of the essential GRSG habitat identified as Priority Habitat Management Areas (PHMA) were managed with stronger protections for GRSG from competing land allocations. This approach would ensure that more important areas for GRSG conservation receive more extensive protections, without unduly hampering BLM's multiple-use obligations.

The same logic extends to the "best of the best" GRSG habitat, constituting a small number of uniquely irreplaceable areas characterized by high levels of GRSG connectivity, genetic exchange, population density, and intact sagebrush. We have previously recommended that a small number of these "best of the best" areas be considered for stronger protections based on local input and support, backed by peer-reviewed scientific literature that takes into account landscape intactness, range-wide population modeling, sage-grouse genetic flow/population connectivity,

²⁷ U. S. Geological Survey. 10 July 2024. *Prioritizing restoration and conservation of sagebrush ecosystems in northwestern Colorado*. Fort Collins Science Center. <https://www.usgs.gov/centers/fort-collins-science-center/science/prioritizing-restoration-and-conservation-sagebrush#overview>

²⁸ U. S. Geological Survey. 10 July 2024. *Prioritizing restoration and conservation of Wyoming's sagebrush ecosystems for wildlife and sagebrush connectivity*. Fort Collins Science Center. <https://www.usgs.gov/centers/fort-collins-science-center/science/prioritizing-restoration-and-conservation-wyomings>

²⁹ Federal Register. 2 October 2015. *12-Month Finding on a Petition to List Greater Sage-Grouse (Centrocercus urophasianus) as an Endangered or Threatened Species*. 80 Fed. Reg. 59858. <https://www.federalregister.gov/documents/2015/10/02/2015-24292/endangered-and-threatened-wildlife-and-plants-12-month-finding-on-a-petition-to-list-greater>

development potential, and spatially explicit models such as the Sagebrush Conservation Design Framework.³⁰

Throughout the GRSG planning process, from 2015 until now, BLM has proposed to provide higher levels of protection for the best of the best habitat in various forms:

- Sagebrush focal areas (SFAs)
- Areas of critical environmental concern (ACECs)
- PHMA with limited exceptions

However, under the 2025 RODs that were finalized for Colorado and Oregon, and in the latest proposed changes, neither ACECs nor PHMA with limited exceptions are under consideration.⁸ In practice, this means that the areas that had these protections will no longer have the increased certainty associated with being managed as exclusion areas for major ROWs, no exceptions to the solar and wind exclusion allocations, and no exceptions to the no surface occupancy (NSO) allocation for fluid minerals. Since these plans do not close any lands to oil and gas development and have very limited closure to ROWs, wind or solar development, the additional protections for a subset of PHMA provided an extra level of certainty for lands that had been identified as providing especially valuable habitat that supported significant numbers of GRSG.

We strongly caution BLM against the application of exceptions except in very rare circumstances. The criteria laid out in the RMPAs are comprehensive, and if rigorously applied should reduce inadvertent impacts to GRSG populations due to exceptions. But allowing any exceptions creates a risk of indirect and cumulative impacts to GRSG populations, which could lead to continued population declines or extirpations. This is exactly the situation that the provisions of the plans were intended to forestall.

In addition, a key component of the 2015 RMPAs required the BLM to prioritize new oil and gas leasing outside of PHMA and GHMA in order to protect that habitat from future disturbance. Prioritization of development outside of priority habitat is also a core component of state GRSG regulations and policies.³¹ The intent to avoid impacts to PHMA and GHMA before minimizing and

³⁰ Doherty, K. et al. 2022. *A sagebrush conservation design to proactively restore America's sagebrush biome: U.S. Geological Survey Open-File Report 2022-1081*. p. 38. <https://doi.org/10.3133/ofr20221081>

³¹ For example, the Wyoming Greater sage-grouse Core Area Protection Executive Order states: "To ensure continued sustainability of Wyoming's economy, incentivizing and prioritizing development outside of Core Population Areas shall be a priority." State of Wyoming. 21 August 2019. *Executive Order 2019-3: Greater sage-grouse Core Area Protection*. <https://wgfd.wyo.gov/media/15359/download?inline>

mitigating is present in the Colorado and Oregon RODs^{32 33} and throughout the 2024 Final EIS.³⁴ Given the BLM's proposal to drop the PHMA with limited exceptions designation, this elevates the need for BLM to provide additional assurances that development will be sited outside of PHMA, consistent with the intent of this planning process and with best available science on the threats to GRSG.³⁵

However, at current, BLM clearly does not intend to defer acres nominated for oil and gas sales^{36 37} and is limiting public comment for new permits.³⁸ The risks to habitat from having more acreage available without guaranteed no surface occupancy or avoidance are much higher. This increased risk to habitat means that extra assurances are warranted. As such, we urge BLM to:

³² Colorado and Oregon 2025 Record of Decision both include this language: "No specific objective or management action will specify a fluid mineral leasing strategy. However, not including specific leasing prioritization language or a leasing strategy does not remove the desired condition to manage public lands to provide suitable GRSG habitat at the HAF mid-, fine- and site-scales. Fluid mineral leasing will be considered in GRSG habitat management areas consistent with the Secretary's discretion under the Mineral Leasing Act (as amended), as well as applicable BLM regulations and policies, and in conformance with RMP goals, objectives, stipulations, and required design features to avoid, minimize, and compensate impacts to GRSG."

Bureau of Land Management. 15 January 2025. *Greater Sage-Grouse Rangewide Planning: Record of Decision and Approved Resource Management Plan Amendment for Oregon*.
https://eplanning.blm.gov/public_projects/2016719/200502020/20126642/251026622/Oregon%20ROD%20&%20ARMPA%20-%201.15.2025.pdf

³³ Bureau of Land Management. 15 January 2025. *Greater Sage-Grouse Rangewide Planning: Record of Decision and Approved Resource Management Plan Amendment for Colorado*.
https://eplanning.blm.gov/public_projects/2016719/200502020/20126347/251026327/Colorado%20ROD%20&%20ARMPA%20-%201.15.2025.pdf

³⁴ Alternatives 4, 5 (Preferred Alternative) and 6 in the Final EIS state the following Fluid Mineral Objective: "Manage fluid mineral leasing and development (including geothermal) in GRSG habitat management areas to avoid, minimize, and compensate for adverse impacts to GRSG habitat to the extent practical under the law and BLM jurisdiction." U.S. Bureau of Land Management. 2024. *Greater Sage-Grouse Rangewide Planning, Final Environmental Impact Statement*. 2-110

³⁵ The primary threat to GRSG is loss of habitat, including both direct loss of habitat due to conversion to other uses, and functional habitat loss due to habitat fragmentation and GRSG avoidance behavior of infrastructure and disturbed areas. Naugle, D. E. et al. 2011. *Sage-Grouse and Cumulative Impacts of Energy Development*. Energy Development and Wildlife Conservation in Western North America. Island Press. 55-70. https://doi.org/10.5822/978-1-61091-022-4_4

³⁶ See discussion on budget reconciliation bill, post-bill. U.S. Department of the Interior. 22 July 2025. *Interior Department Advances Energy Dominance through the One Big Beautiful Bill Act*.
<https://www.doi.gov/pressreleases/interior-department-advances-energy-dominance-through-one-big-beautiful-bill-act>

³⁷ See discussion on oil & gas leasing process. Bureau of Land Management. 8 May 2025. *Oil and Gas Leasing – Land Use Planning and Lease Parcel Reviews*. IM 2025-028. <https://www.blm.gov/policy/im-2025-028>

³⁸ U.S. Department of the Interior. 23 April 2025. *Department of the Interior Implements Emergency Permitting Procedures to Strengthen Domestic Energy Supply*.
<https://www.doi.gov/pressreleases/department-interior-implements-emergency-permitting-procedures-strengthen-domestic>

- Adopt a coherent direction to prioritize leasing outside of PHMA that will apply universally across field offices.³⁹
- Ensure that adaptive management provisions in the plans are sufficiently clear, enforceable, reliable and consistent with best available science in order to ensure that the plans are functioning as intended, and that habitat and populations remain intact. Development that is permitted must be carefully scrutinized, and any additional surface disturbance that is allowed must be monitored, responded to and addressed.
- Strengthen the criteria for categorizing ROWs as major ROWs subject to these criteria for approval.⁴⁰ Given that some of the most valuable and vulnerable habitat is now on the table, this language should be updated to include a presumption that all pipelines and powerlines will be treated as major ROWs.
- Require a 30-day public comment period as part of all project-level NEPA, as is required for exceptions to the NSO for oil and gas development.
- Require a 30-day public comment period and project-level NEPA on proposed wind and solar development in PHMA.
- Ensure that the language in the RMPAs clearly requires a 30-day public comment period and project-level NEPA for approving development along with the waivers, exceptions and modifications.

VI. RECOMMENDATION: ADDRESS LACK OF SUFFICIENT INFORMATION FOR HABITAT DESIGNATIONS & LAND DISPOSAL IN UTAH

Insufficient Information

Sage-grouse populations in Utah are important because they represent numerous resilient populations across a diverse and fragmented landscape, contributing to the long-term viability of the species across its range. The Habitat Management Area (HMA) boundaries in Utah, as presented in the November 2024 Final EIS, were based on the Utah GRSG RMP amendments (2015 and 2019) and the State of Utah's 2019 Sage-Grouse Management Area (SGMA) boundaries.⁴¹

Given this background, we request further explanation as to how the Proposed Amendment, as presented for Utah in November 2024, is no longer in-line with state policies, as stated in the Proposed Changes, and thus warrants the significant proposed changes in habitat designations,

³⁹ See for example Alternative 3 in the 2024 Final EIS, which clearly stated: "If possible, place [oil and gas] development outside of PHMA." Bureau of Land Management. 2024. *Greater Sage-Grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

⁴⁰ Right now, the proposed language for PHMA provides "If during consideration of a proposed ROW action (project level authorization) the determination of whether it is a major or minor ROW is questioned, with supporting rationale, the Authorized Officer (AO), in consultation with the BLM State Office lead(s), will make the final determination." See 2025 Proposed Changes for PHMA with limited exceptions. p.10. Bureau of Land Management. 15 November 2025. *Greater Sage-Grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

⁴¹ Bureau of Land Management. 2024. *Greater Sage-Grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. 3-14. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

habitat boundaries, and associated protections. Further, the claim that Proposed Amendment warrants significant changes is in direct conflict with the statement in the Proposed Changes document, which states that “all changes were within the range of alternative HMA boundaries considered in the Final EIS that was released on November 15, 2024.” In reviewing the Final EIS (Table 2-15, page 2-128), it is unclear how the 2025 proposed changes are within the range of alternatives evaluated in 2024.

BLM’s proposed changes appear to affect substantial portions of GRSG habitat managed in Utah, impacting *all* habitat designations. While statewide maps were provided, no quantification of changes was provided. Geospatial data was available, but we identified errors in how habitats were attributed. Review of the geospatial data suggests the following:

- GHMA removed altogether – approximately 970k acres
- PHMA removed altogether – approximately 91k acres
- GHMA Connectivity (removed altogether) and redesignated as GHMA – 323k acres
- PHMA downgraded to GHMA – 276k acres
- GHMA upgraded to PHMA – 3k acres

Over 1.6 million acres of GRSG habitat is being eliminated altogether (thus losing any sort of protection in regards to sage-grouse) or converted to another habitat type, and BLM is proposing significant changes in the amount of habitat within each designation and the associated management prescriptions. Of note is the approximately 1 million acres that are being removed as either GMHA or PHMA, without any explanation. Our organizations are concerned that the lack of information provided in the Proposed Changes document does not allow the public to understand and meaningfully comment on the changes.

The overall lack of analysis of potential impacts to GRSG populations that would result from these significant changes in habitat designations and associated protections is of considerable concern. We request that BLM provide further information to enable the reader to determine if these numbers are correct, the total amount of each habitat type remaining, and the explanation for each of these changes (and impacts of each to specific sage-grouse populations).

Lands Available for Disposal

Finally, BLM should provide information about “Lands Available for Disposal” (see map in Proposed Changes, page 27) and explain how the map is relevant to the action under consideration. Specifically, BLM should explain why those lands were identified for disposal, how this is in the public interest, and how the proposed land disposal might impact GRSG populations.

In the alternatives considered but not analyzed in the 2024 Final EIS, BLM dismissed comments regarding the need to evaluate an alternative addressing the impacts of land disposal on GRSG with the following rationale:

“The BLM did not address land tenure adjustments in GRSG habitat in this planning effort. The existing GRSG management direction from the 2015 and 2019 RMP Amendments would remain in place which identify Priority Habitat Management Areas as land tenure zone 1, where the objective is to retain the lands in public ownership. Addressing an alternative that would allow for the adjustment of these land tenure allocations does not meet the purpose and need of this amendment. The BLM did not address land tenure because as noted in the Purpose and Need, the BLM is only proposing to amend a subset of 2015 and

2019 GRSG RMP Amendment decisions that the BLM found were not sufficiently and appropriately addressed and that did not need to be updated based on new scientific information or changes in land use. The 2015 and 2019 land tenure decisions were not identified as needing amendment.”⁴²

Yet in the 2025 Proposed Changes document, BLM offered maps which overlay the changes to Utah habitat designations with lands apparently proposed for disposal in Utah with no explanation of why this information is now relevant. BLM did not provide any analysis of this information in the context of the purpose of this planning process – to amend management direction for GRSG – and did not address whether new lands are being proposed as eligible for disposal through this RMPA.

From what we are able to determine through our own analysis (see Appendix), it appears that through this RMPA, BLM is proposing to add approximately 27,000 acres (42 square miles) of new BLM lands in Utah not previously identified for disposal with no explanation for how this would be in the public’s best interest and without a clear request for public comment.

BLM must clarify why it appears to be making those lands in Utah eligible for disposal and how that fits within the Purpose and Need for this planning process – particularly because the BLM itself stated less than a year ago that land tenure decisions were outside of the scope of this planning process. Given the lack of supporting data or explanation as to why this information was included, the public is clearly unable to understand or comment meaningfully on these changes as proposed.

VII. RECOMMENDATION: SITE MAJOR RIGHTS-OF-WAY OUTSIDE OF HABITAT

Major Rights-of-Way can and should be sited outside of Priority & General Habitat

Significant proposed changes that would open GHMA to major ROWs are an unnecessary and unjustified risk to robust populations of GRSG that carry little benefit for industry. Opening GHMA in Nevada to Major ROWs is a significant departure from the proposed alternative in the 2024 Final EIS which classified these areas as “Avoidance” zones to be managed under the same guidance as PHMA on BLM-NV lands.

We are concerned that, taken together, the elimination of the more comprehensive habitat protections of PHMA with limited exceptions along with opening GHMA to major ROW development will fundamentally damage the integrity of the remaining connected habitats for sage-grouse. In doing so, this plan will fail to address habitat degradation and fragmentation, leading to a higher likelihood of further population declines requiring the USFWS to list the species. It is vitally important that BLM exercise its authority over discretionary activities – such as linear ROWs – in a meaningful way to maintain the multi-use mission of BLM.

⁴² Bureau of Land Management. 2024. *Greater Sage-Grouse Rangewide Planning Proposed Resource Management Plan Amendment and Final Environmental Impact Statement*. Rationale for Dismissal from Detailed Analysis.
https://eplanning.blm.gov/public_projects/2016719/200502020/20123241/251023221/GRSG_FEIS_Chapters%201-5%20and%20Appendices.pdf

General Habitat is critical for robust Greater Sage-Grouse Populations

GHMA within Nevada have been identified as, “area that is likely to be occupied seasonally or year-round outside of a Priority Habitat Management Area and where management will apply to sustain the greater sage-grouse populations. GHMA may include active leks, seasonal habitats, and fragmented or marginal habitat, as well as areas identified as corridors connecting seasonal habitats.”⁴³ To be designated as GHMA, an area must have either high habitat suitability, high sage-grouse occupancy, or must connect important seasonal Priority Habitat. These areas are vital for managing robust grouse populations and in many cases should be priorities for investment, management, and restoration to improve on the ground conditions and connectivity for local populations.

Habitat Management Areas (HMA) in Nevada and northeastern California were developed through a collaborative, science-based process involving the Nevada Department of Wildlife (NDOW) and the U.S. Geological Survey (USGS) as well as BLM.⁴⁴ These efforts rely on known sage-grouse locations and habitat characteristics that support healthy populations throughout their life cycles. The Nevada Sagebrush Ecosystem Program also played a key role in shaping HMA mapping.

All mapped HMAs in Nevada and northeastern California have been clipped to NDOW’s Population Management Unit (PMU) boundaries to ensure that only occupied, high-quality habitat essential for sage-grouse survival across lands managed by BLM-NV and the California Eagle Lake–Applegate Field Offices is represented in the mapping layers used for management and decision making.

Opening GHMA to Major ROWs is not sufficiently explained or supported

BLM suggested language opening GHMA allocation for major ROWs in Nevada “to preclude negative impacts to PHMA habitats”⁴⁵ is neither sufficiently explained nor supported by existing Reasonably Foreseeable Development Scenarios for renewable energy development. It is unclear how much acreage would have protections from siting Major ROWs removed and how this proposed change will still reliably conserve GRSG habitat, thus prohibits meaningful public engagement.

Section 503 of the Federal Land Policy and Management Act (FLPMA) directs federal land management agencies to designate right-of-way corridors “in order to minimize adverse environmental impacts and the proliferation of separate rights-of-way.”⁴⁶ In accordance with the Energy Policy Act of 2005, BLM developed a programmatic EIS/RMP Amendment and issued a

⁴³ See p. 3-16 on Nevada Habitat Management Areas from Appendix 3. *Greater Sage-Grouse Habitat Management Area State-by-State Mapping Strategies*. Greater Sage-Grouse Rangewide Planning Proposed RMP Amendment and Final EIS. https://eplanning.blm.gov/public_projects/2016719/200502020/20122939/251022919/Appendix_03_GRS_G_HMA_Strategy_Summaries_508.pdf

⁴⁴ See the Nevada Sagebrush Ecosystem Program for detailed process and references on habitat suitability modeling and habitat management area mapping. State of Nevada Sagebrush Ecosystem Program. 2021. *Habitat Modeling & Products*. https://sagebrusheco.nv.gov/HSM/Habitat_Suitability_Modeling_and_Work_Products/?csrt=188032744997071765

⁴⁵ 2025 Proposed Changes document at 21.

⁴⁶ 43 U.S.C. §1763. 3 January 2024

Record of Decision designating 126 utility corridors (collectively called Section 368 or West-wide Energy Corridors). Individual BLM Resource Management Plans in the Nevada and Northeastern California GRSG Planning Area include designated Section 368 Energy Corridors and utility corridors designated through individual RMP planning processes.

Consistent with FLPMA and its planning handbook, the 2015 Nevada and NE California GRSG plan amendments designated existing corridors as open to new linear energy ROWs. Further, the 2015 Nevada and NE California GRSG plan amendments (Action D-LR-LUA-18) preclude the designation of new utility corridors in PHMA and GHMA, consistent with FLPMA. These decisions provide clear plan-level direction regarding the locations where new transmission lines can and cannot be developed. The current Proposed Changes, which outlines new major ROWs outside of corridors in GHMA or PHMA would undermine the intent of FLPMA and two decades of thorough BLM planning to designate utility corridors. Similarly, the practice of amending RMPs to designate new corridors to match proposed linear ROW projects defeats the stated purpose of FLPMA and seriously undermines the planning process.

Opening GHMA in Nevada to major ROWs based on a desire to ensure more consistent land management based on California HMA management does not provide sufficient justification for putting substantial acreage of GRSG HMA at risk without sufficient opportunity for comment during project development. Notably, the 2024 Final EIS did not distinguish between the management of HMA and siting Major ROWs in California and Nevada, and paradoxically to the provided argument, grouse habitat in California is managed and mapped based on Nevada standards.

BLM also states that the proposed changes are in response to "concerns raised during the governor's consistency review that requested clear guidelines that would allow renewable energy development in low-impact areas while still prioritizing habitat conservation." The GRSG EIS does not in and of itself delimit areas for renewable development but should be used to develop exclusion criteria for development in combination with other programmatic guidance such as the Western Solar Plan finalized in August 2024.⁴⁷

The Western Solar Plan identified nearly 12 million acres of previously disturbed BLM lands near existing transmission corridors within Nevada as open for solar development; there is no clearly identified need to site renewables projects within HMA based on the estimated need to develop 48,119 acres of solar on BLM administered lands within the state of Nevada by 2045.⁴⁸

Modernizing the Nation's energy grid through reconductoring and other upgrades is a vital need for all sectors of the American economy. However, these projects should instead be sited in existing major rights-of-way and BLM's existing designated Section 368 Energy Corridors, including through co-locating major transmission with existing major highway rights of way, an allowable and encouraged practice under Nevada Administrative Code Chapter 408.

⁴⁷ Bureau of Land Management. 19 December 2024. *Record of Decision and Amendments for Utility-Scale Solar Energy Development*. <https://eplanning.blm.gov/eplanning-ui/project/2022371/510>

⁴⁸ Heath, G. et al., February 2022. *Environmental and Circular Economy Implications of Solar Energy in a Decarbonized U.S. Grid*. National Renewable Energy Laboratory. <https://www.nrel.gov/docs/fy22osti/80818.pdf>

BLM should retain the 2015 and 2024 GRSG management plan direction that clearly allows for new linear ROWs in *existing* designated utility corridors. Individual major ROW projects within GHMA should continue to be subject to avoidance criteria, with any major electrical or other ROW development directed to existing previously identified 368 Corridors.

By definition, Major ROWs require linear disturbance across large distances, a high density of disturbance or large footprints, with high levels of activity or surface disturbance.⁴⁹ Major ROWs pose clear threats to the continued existence of GRSG populations and seasonal habitat; avoiding siting highly impactful projects in grouse HMA is easily accomplished and necessary for balanced multiple use decisions that avoid future listings. Thus, our organizations strongly encourage BLM to abandon this proposed change in Nevada and return to the proposed alternative in the 2024 Final EIS, which classified these areas as “Avoidance” zones to be managed under the same guidance as PHMA on BLM-NV lands.

VIII. CLOSING

It is our sincere hope that BLM will provide the additional requested information and analyses. Together, we encourage BLM to finalize management plans that are consistent across the range, science-based, and effective at conserving habitat in a manner that reverses the decline of GRSG. Our western communities deserve defensible plans that move these important lands from a cycle of planning to sound on-the-ground management.

Sincerely,

Sara Brodnax
Director, Public Lands Policy
National Audubon Society

Kristen Byrnes Floom
Public Lands Counsel
National Wildlife Federation

Devin O’Dea
Western Policy & Conservation Manager
Backcountry Hunters and Anglers

Ted Koch
Executive Director
North American Grouse Partnership

Larry Berrin
Executive Director
Montana Audubon

Matt Cahill
Sagebrush Sea Program Director
The Nature Conservancy

Russell Kuhlman
Executive Director
Nevada Wildlife Federation

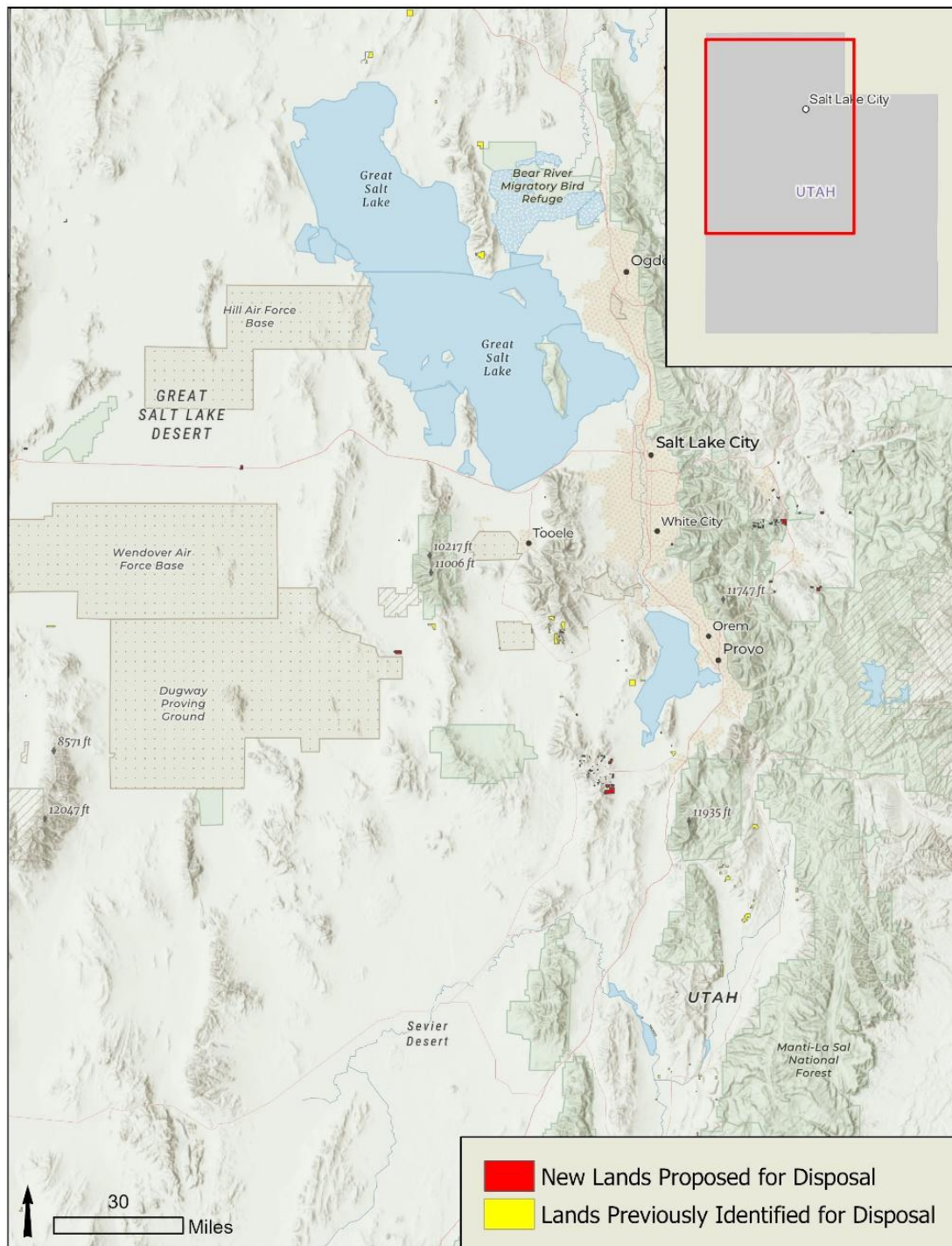
Meghan Riley
Wildlife Program Manager
Wyoming Outdoor Council

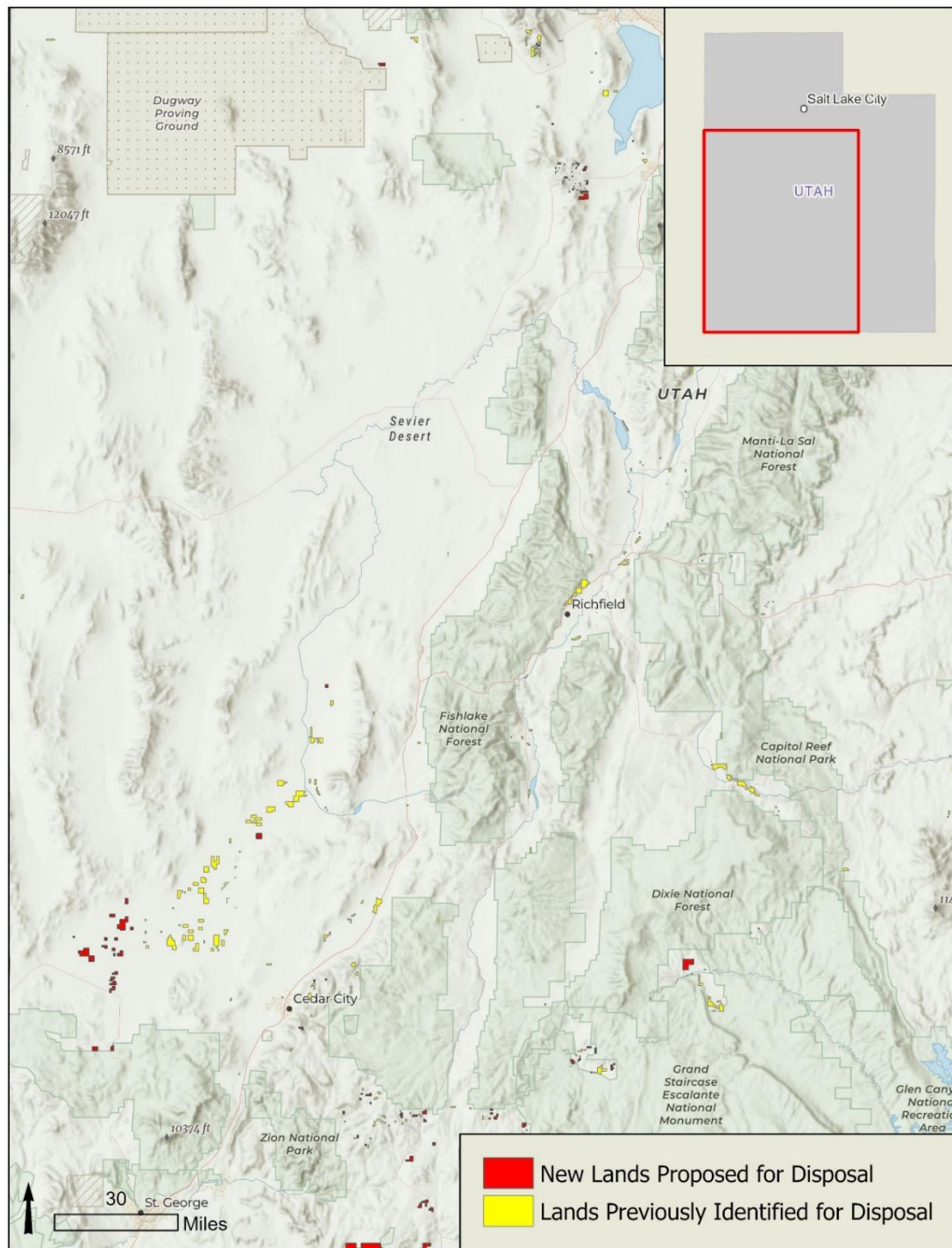
Suzanne O’Neill
Executive Director
Colorado Wildlife Federation

⁴⁹ Bureau of Land Management. 2024. *Greater Sage-Grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming*. <https://eplanning.blm.gov/eplanning-ui/project/2016719/510>

APPENDIX. PUBLIC LANDS IDENTIFIED FOR DISPOSAL IN UTAH

The two maps following provide a visual comparison of lands previously identified for disposal (yellow) using publicly available information⁵⁰ and those newly identified for disposal (red). Red polygons are those parcels identified by the BLM in the provided layer for the current Greater sage-grouse planning process⁵¹ but not otherwise known to be identified in existing BLM Field and State Office resource management plans.





⁵⁰ Bureau of Land Management. 2025. *BLM Parcels Identified for disposal by Field and State Office Management Plans* (as downloaded when previously publicly available).
https://services1.arcgis.com/KbxwQRRfWyEYLgp4/arcgis/rest/services/LPAD_Parcels_for_Disposal/FeatureServer

⁵¹ Bureau of Land Management. 2025. *Map Data*.
https://eplanning.blm.gov/public_projects/2016719/200609542/20141781/251041761/UT_2025_GRS_G_RMPA_AllocationProposedChanges.gdb.zip