

Exhibit B

**Public Correspondence Received as
of November 28, 2023**

**Public Correspondence for Sage-Grouse Habitat Map Update
as of November 27, 2023**



United States Department of Agriculture

November 21, 2023

Sage-Grouse Planning Team
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Dr SE
Salem, OR 97302

To Whom it May Concern,

The U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) Oregon would like to acknowledge the efforts undertaken by the Oregon Department of Fish and Wildlife (ODFW) to update Oregon's "Core" and "Low Density" Sage-Grouse habitat designations.

Since 2010 NRCS Oregon has supported Sage-Grouse conservation on private lands through the Sage Grouse Initiative (SGI). This voluntary program provides technical and financial assistance for producers seeking to implement conservation measures on their property. Once the initial ODFW Sage-Grouse habitat designations were published in 2011, NRCS Oregon incorporated these data into our ranking criteria to prioritize SGI projects based on their proximity to "Core" and "Low Density" habitat. As these data are improved and updated, NRCS can consult them to ensure our SGI project prioritization criteria are congruent with current local science.

Sincerely,

A handwritten signature in black ink, appearing to read "Christina Santana", with a long horizontal line extending to the right.

Christina Santana
State Biologist
USDA-NRCS
625 SE Salmon Ave, Suite 4
Redmond, OR 97756

From: Joanna Zhang <jzhang@onda.org>
Sent: Monday, January 9, 2023 11:32 AM
To: VOLD Skyler T * ODFW <Skyler.T.VOLD@odfw.oregon.gov>
Cc: Mark Salvo <msalvo@onda.org>
Subject: Re: Oregon Sage-Grouse Core Area Update

Hi Skyler,

Happy New Year! I hope that you had a great holiday season and that 2023 is off to a good start for you.

I'm attaching a letter on behalf of ONDA that highlights what we'd like ODFW to consider during the revision process of Oregon's Core and Low-Density habitat designations. Please let me know if you have any questions.

Thank you for all you do and I'll see you in a few weeks at the next Prineville LIT meeting!

With care,

Joanna

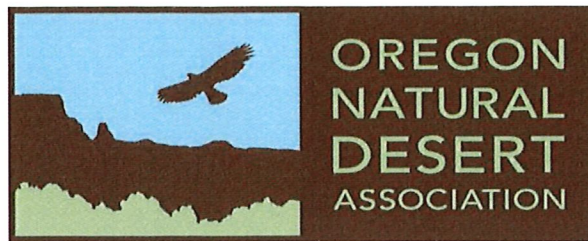
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Joanna Zhang ([she/her](#))
Wildlife Coordinator

(541) 330-2638, ext. 309
Oregon Natural Desert Association
50 SW Bond St, Suite 4
Bend, OR 97702

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January 9, 2023

Skyler Vold
Sage-Grouse Conservation Coordinator
Oregon Department of Fish and Wildlife
P.O. Box 8
Hines, Oregon 97738

Re: Review and Revision of Oregon's Sage-Grouse Priority Areas for Conservation and Low-Density Habitat Designations

Dear Mr. Vold:

Oregon Natural Desert Association (ONDA) is pleased to offer initial input on the Oregon Department of Fish and Wildlife's (ODFW) review and potential revision of the state's Sage-Grouse Priority Areas for Conservation (PACs) and Low Density habitat designations in preparation for updating Oregon's Sage-Grouse Conservation Assessment and Strategy (CAAS). We appreciated learning more about these processes from you at the Oregon Sage-Grouse Conservation Partnership annual meeting in Burns this autumn.

The review and revision process should retain existing Priority Areas for Conservation for sage-grouse

Greater sage-grouse populations have declined significantly over the last six decades, with an 80 percent rangewide decline since 1965 and a nearly 40 percent decline since 2002 (Coates et al. 2021). In Oregon, and despite recent moderate increases, the statewide population has fallen 40 percent below 2003 baseline estimates (Vold 2022). The species has not shown recovery since the CAAS was written in 2011 and federal conservation strategies were adopted in 2015. In the last year, both peripheral and core sage-grouse populations have continued to experience notable declines (Vold 2022).

Sage-grouse require large, interconnected areas of sagebrush steppe to persist (Connelly et al. 2011a). Migratory populations have large annual ranges that can encompass $>2,700 \text{ km}^2$ (1,042 mi^2 /667,184 ac) (Knick and Connelly 2011, *citing* Dalke et al. 1963; Schroeder et al. 1999; Leonard et al. 2000) (the species may use up to 2,500 mi^2 per population (Rich and Altman 2001)). Large-bodied birds are generally more strongly affected by habitat loss and fragmentation (Winter et al. 2006). Developing and implementing conservation strategies at

regional or landscape scales will have the greatest benefit for sage-grouse and their habitat (*see* Doherty et al. 2011). Although conclusive data on minimum patch size is unavailable (Connelly et al. 2011b), conserving large expanses of sagebrush steppe is the highest priority to conserve sage-grouse (Aldridge et al. 2008; Connelly et al. 2011a; Wisdom et al. 2005; *see* Manier et al. 2013: 25-26).

Most recently, the U.S. Geological Survey (USGS) identified areas of sagebrush steppe with higher levels of ecological integrity with lower cumulative threats as Core Sagebrush Areas (CSAs; top ~20% of normalized Sagebrush Ecological Integrity scores) and Growth Opportunity Areas (GOAs; next highest ~50%; Doherty et al. 2022). The USGS found that the West has lost an average of 1.3 million acres of CSA- and GOA-quality sagebrush steppe annually over the last two decades. Although some of the areas within PAC boundaries have transitioned to Other Rangeland Areas (ORAs), this doesn't warrant reducing existing PACs. The 2011 CAAS notes, "[t]o maintain connectivity of habitat and sage-grouse populations, efforts will be required to rehabilitate acres lost to conversion of exotic weeds and grasses, juniper encroachment, and seedings within the extant range of sage-grouse" (Hagen et al. 2011). Many of these ORAs are interspersed with GOAs on the peripheries of PACs and/or contain leks, making them important opportunities for maintaining connectivity and preventing further loss of sage-grouse range.

The review and revision process should establish new Priority Areas for Conservation or expand on existing Priority Areas of Conservation to include additional important habitats for sage-grouse

ODFW, federal agencies, partners and stakeholders should update their sage-grouse conservation management planning to reflect recently-identified CSAs and GOAs, as ecological integrity is strongly linked to sage-grouse population performance. Current PAC boundaries encompass most of the CSAs identified in Oregon with one notable exception: a large contiguous area north of the Warners PAC and south of the Brothers and Paulinas PACs (Map 1). This area includes dozens of known leks that share connectivity with the Brothers and Paulinas PACs and a separate group of interconnected leks to the south (*see* Map 1). ONDA recommends that the review and revision process designate a new PAC that encompasses the CSA and two groupings of interconnected leks in this zone.

ONDA also recommends that revised PACs include more winter and summer habitat for sage-grouse. Henderson et al. (2019) and Henderson (2019) modeled these key habitat types in eastern Oregon. Extensive areas fall outside of existing PACs (*see* Attachment 1 and Attachment 2). Given the importance of winter and summer habitat, the loss or fragmentation of these areas can have a disproportionate impact on sage-grouse population size locally and regionally (Caudill et al. 2013; Oregon 2013 DEIS: 8-39).

The scientific literature recommends protecting sage-grouse winter habitat (Braun et al. 2005, *citing* Connelly et al. 2000 and Moynahan et al. 2007). Sage-grouse winter habitat must provide tall, healthy sagebrush for food and cover to support the birds throughout the season (Braun et al. 2005; Connelly et al. 2011a, *citing others*). Sage-grouse typically show high fidelity to winter habitat areas, and a single wintering area may support several different breeding populations (i.e., populations of males and females that use different breeding and nesting habitats in spring) (Oregon 2013 DEIS: 8-39; SGNTT 2011: 51). Moynahan et al. (2007) also observed that the quality of winter habitat appears to influence the abundance and condition of female sage-grouse and their nesting effort and clutch sizes in spring. Healthier females are more likely to have larger clutches and re-nest in case of nest failure (*i.e.*, from predation).

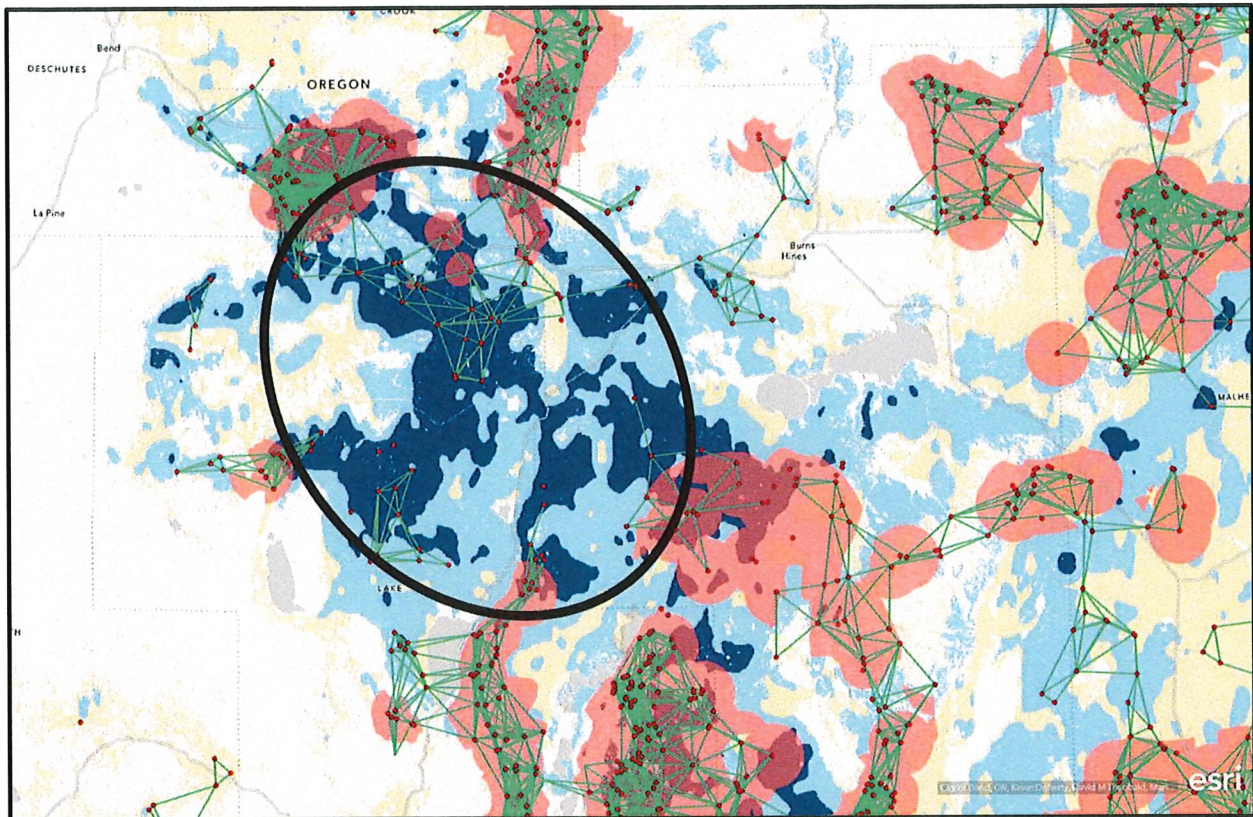
Meanwhile, high-quality, late brooding-rearing habitats are key to maintaining viable sage-grouse populations. Late brood-rearing habitats include mesic and higher elevation areas that support sage-grouse broods in late summer and early autumn. The Bureau of Land Management defines late brood-rearing habitat as a priority sage-grouse habitat “used from July through September...includ[ing] mesic sagebrush and mixed shrub communities, wet meadows, and riparian areas” (Oregon 2015 ARMPA: 5-12). Late brood-rearing habitats are often considered a population-limiting habitat type due to their strong influence on chick survival, and by extension, population growth (Taylor et al. 2012; Dahlgren et al. 2016; Street 2020).

We appreciate ODFW’s attention to sage-grouse conservation and initiating a process for updating its core areas to reflect new research and developments. Identifying and adopting a comprehensive network of PACs will be essential to conserving and recovering this iconic indicator species.

Sincerely,

Joanna Zhang
Wildlife Coordinator

Map 1.



The density and location of active and pending sage-grouse leks (red points) combined with the broad contiguous expanses of identified Core Sagebrush Areas (dark blue) and Growth Opportunity Areas (light blue) (Doherty et al. 2022) north of the Warners PAC and south of the Brothers and Paulinas PACs (pink) should be designated as new or expanded PACs to support long-term conservation of the species. Sage-grouse leks less than 18km apart are considered part of the same complexes, which are important for connectivity and genetic exchange (green lines) (Knick and Hanser 2011).

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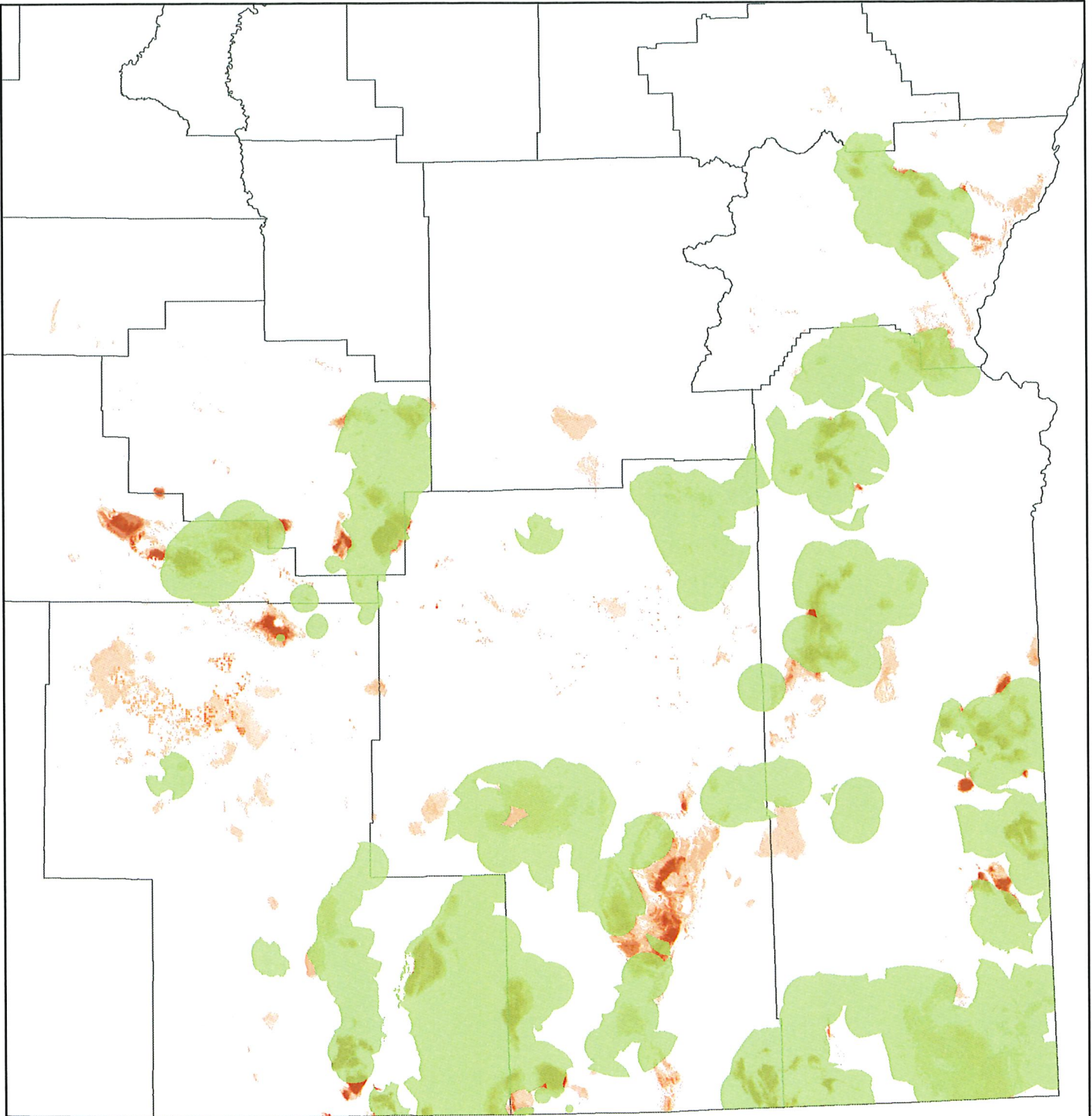
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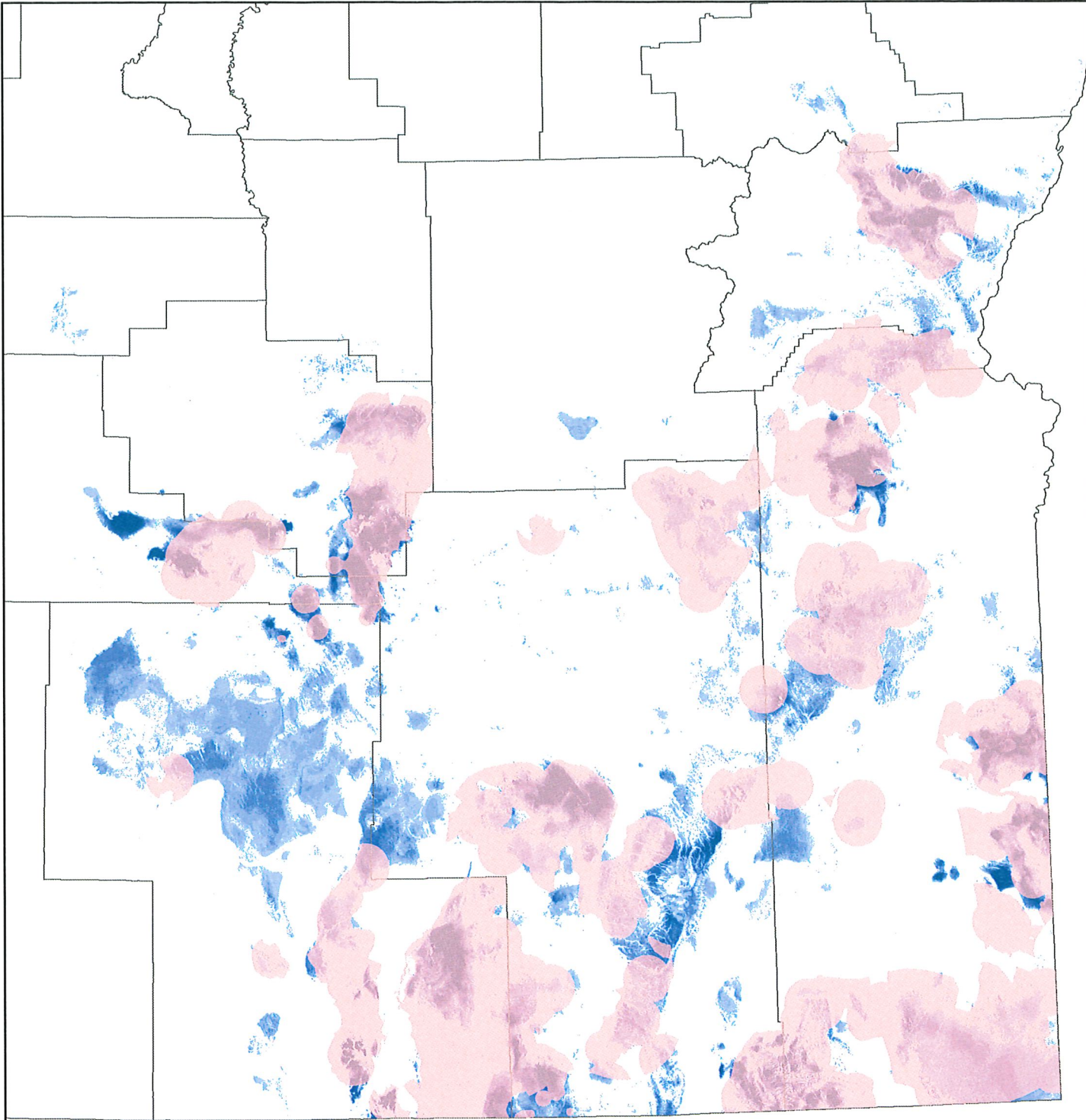
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Attachment 1: Greater Sage-Grouse Summer Habitat Compared to Priority Habitat in Oregon



-  Greater Sage-Grouse Priority Habitat (ARMPA 2015)
-  Lower-Probability Summer Habitat (Henderson 2019)
-  Higher-Probability Summer Habitat (Henderson 2019)

Attachment 2: Greater Sage-Grouse Winter Habitat Compared to Priority Habitat in Oregon



- Greater Sage-Grouse Priority Habitat (ARMPA 2015)
- Lower-Probability Winter Habitat (Henderson 2019)
- Higher-Probability Winter Habitat (Henderson 2019)

From: "SageGrouse Plan * ODFW" <SageGrouse.Plan@odfw.oregon.gov>
To: "SageGrouse Plan * ODFW" <SageGrouse.Plan@odfw.oregon.gov>
Date: 07/10/2023 05:58 PM
Subject: Oregon Sage-Grouse Habitat Update
Sent by: "VOLD Skyler T * ODFW" <Skyler.T.VOLD@odfw.oregon.gov>

Hello, we appreciate the opportunity to review this and will get back to you ASAP.

Have a good day!

Christina Witham

Baker County Commissioner

1995 3rd St.

Baker City, OR 97814

541-519-3899

cwitham@bakercountyor.gov

From: Wufoo <no-reply@wufoo.com>
Sent: Tuesday, July 18, 2023 12:12 PM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Subject: Sage-grouse Plan Revision [#2]

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Email kimberly_haab@fws.gov

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COMMENT BOX

I am the Wildlife Biologist for the Sheldon-Hart Mountain NWRC. I think the habitat revisions look good within and surrounding the Hart Mountain NAR boundaries. I do not see any missed GRSG habitat on the refuge, and I like the increased connectivity between core habitat proposed by the revision. Thanks for the hard work you've put into these revisions!

▪

From: Wufoo <no-reply@wufoo.com>
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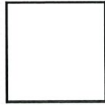
Are you an Oregon resident? Yes
(Optional)

Email jackhansenrsr@gmail.com

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COMMENT BOX See attached.

Attach a File



[comments_on_proposed_changes_to_updated_habitat_map_aug_4_2023rsr_biologist.pdf](#)

1.40 MB • PDF

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Sage-Grouse Core/Low Density Habitat Boundary Revision Comments

Jack Hansen, Roaring Springs Ranch

August 4, 2023

1. Speaking on behalf of Stacy Davies and Roaring Springs Ranch, we propose that the edge of low-density habitat that extends out into the meadows on Roaring Springs property in Diamond be pushed back to follow the rim above Kiger Creek (see Figure 1). These are irrigated meadows for ranching and have developments on them; therefore it seems like unlikely habitat for sage-grouse to use. Each orange arrow points to a house/building, a series of buildings, or a corral (These buildings can be seen when you zoom in closer in the Landscape Planning Tool). The yellow line is a rough example of what the boundary might be pushed back to in order to exclude the meadows.



Figure 1.

2. Our second proposal would be to reevaluate the core habitat boundary along Catlow Rim south of Roaring Springs Ranch headquarters; headquarters is indicated by the orange arrow. Some of the canyons along Catlow Rim, such as Dry Creek, Home Creek, and Threemile Canyons, are very steep and rocky and probably would not be fit habitat for sage-grouse. It would be beneficial to consider taking the boundary back to follow the edges of these canyons up and around to the heads of the canyons, as shown in the rough example outlined in yellow (see Figure 2).

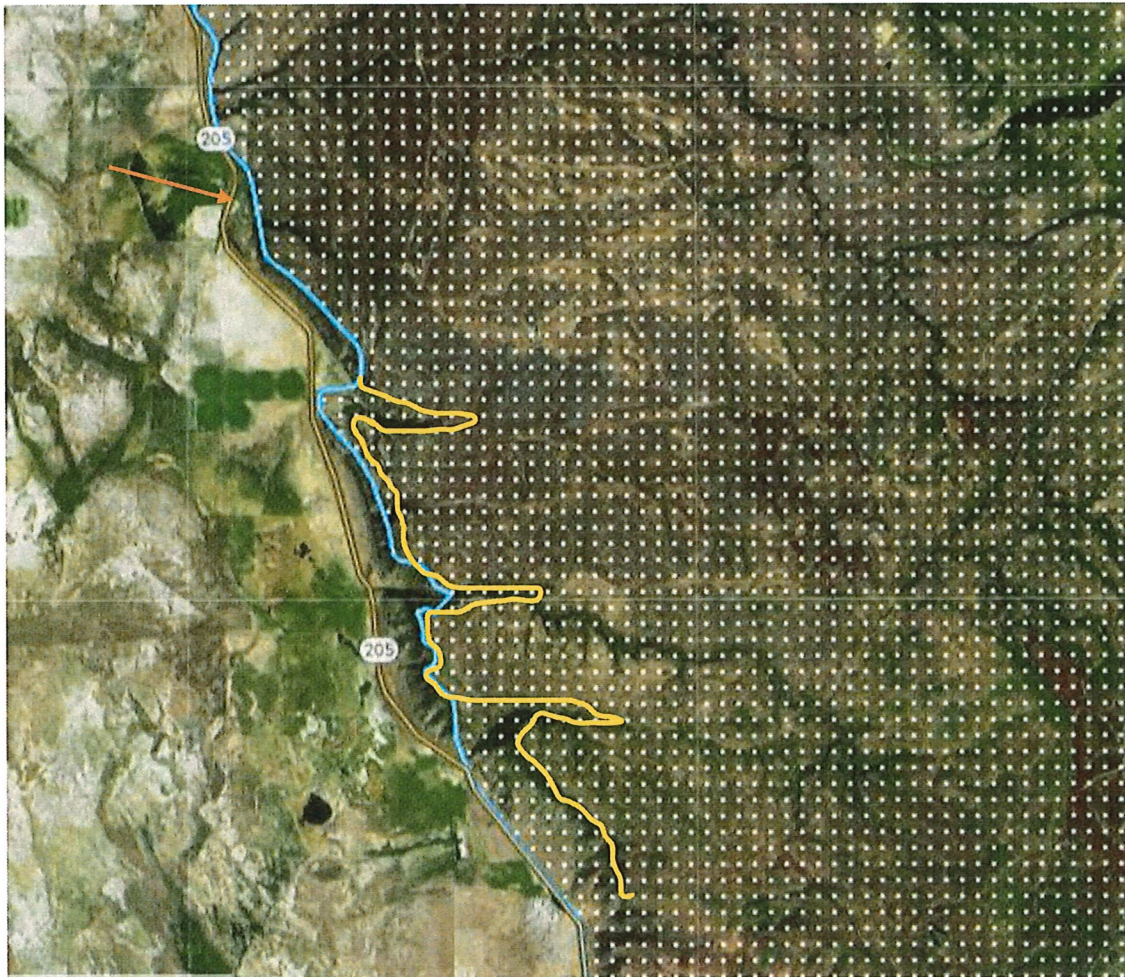


Figure 2.

3. Our third proposal would be to take back the section of low-density habitat that juts out into the west side of Catlow Valley, indicated by the orange circle in Figure 3, and follow the west Catlow rim more closely around this section. This area of the valley burned in a fire and was reseeded into crested wheatgrass. The ranch has a GIS shapefile of fires on the ranch, and the fire area in Figure 4 matches up with this jutting section of low-density habitat. The Landscape Planning Tool also shows this area as 0-5% shrub cover (see Figure 5) and 0 to perhaps 2-3% sagebrush cover (see Figure 6). Figure 6 gives an example in yellow of an alternative boundary that could be formed to clip out this section from low-density habitat.

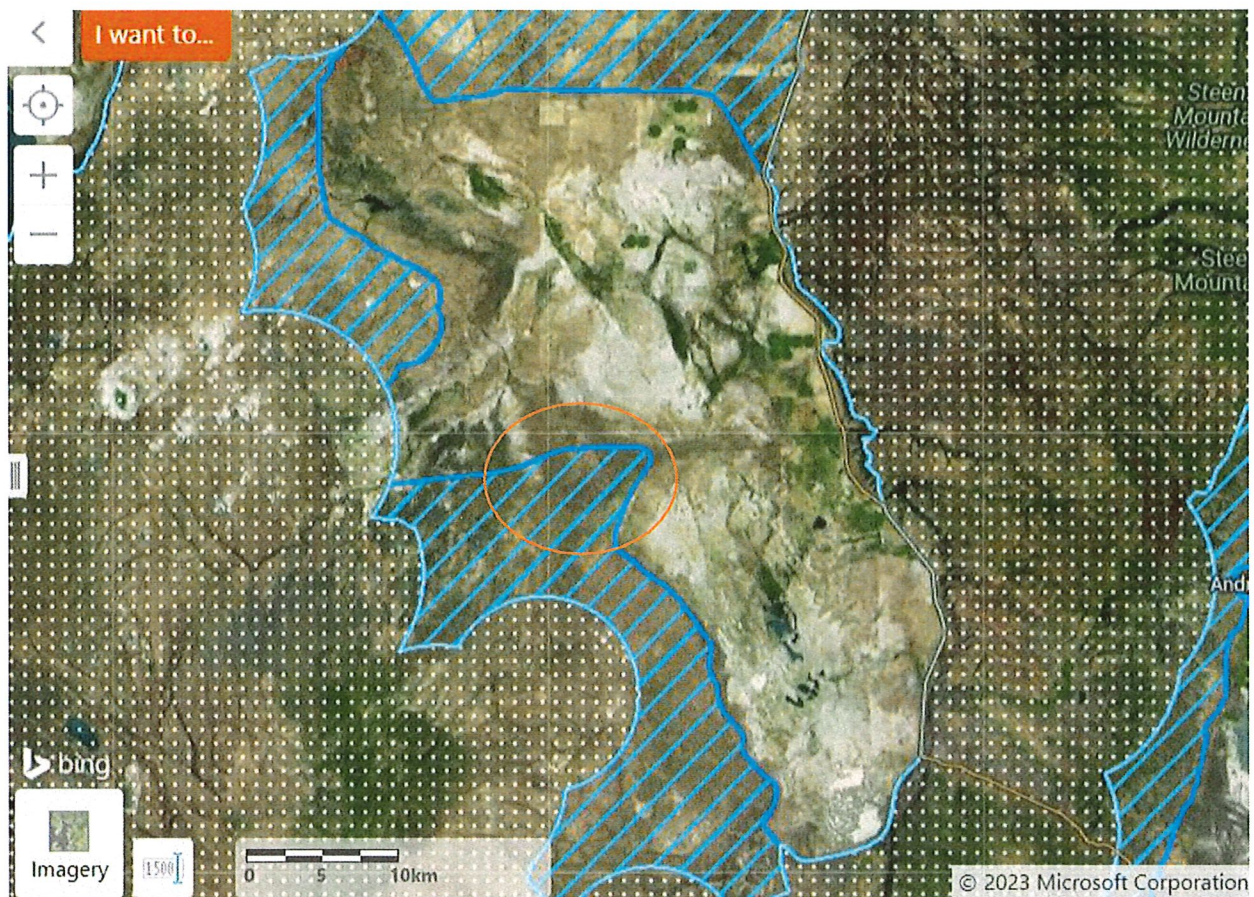


Figure 3.

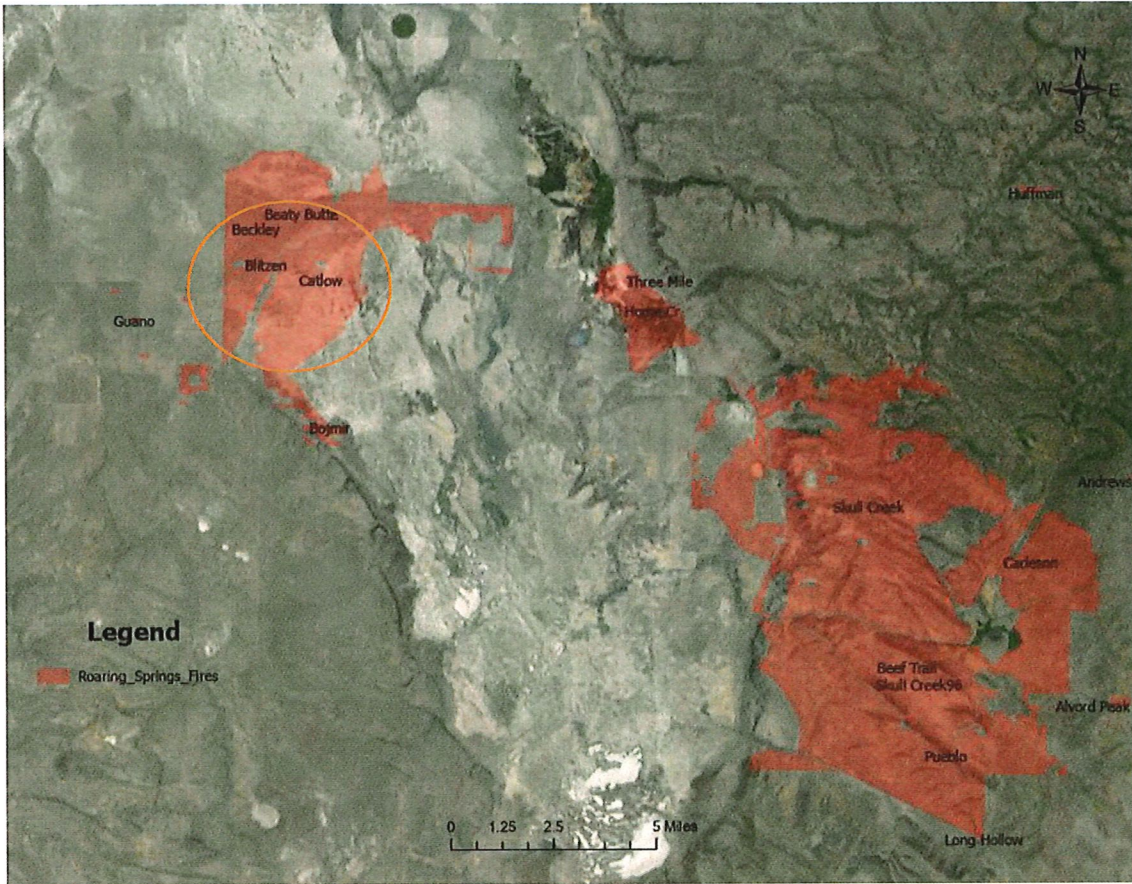


Figure 4.

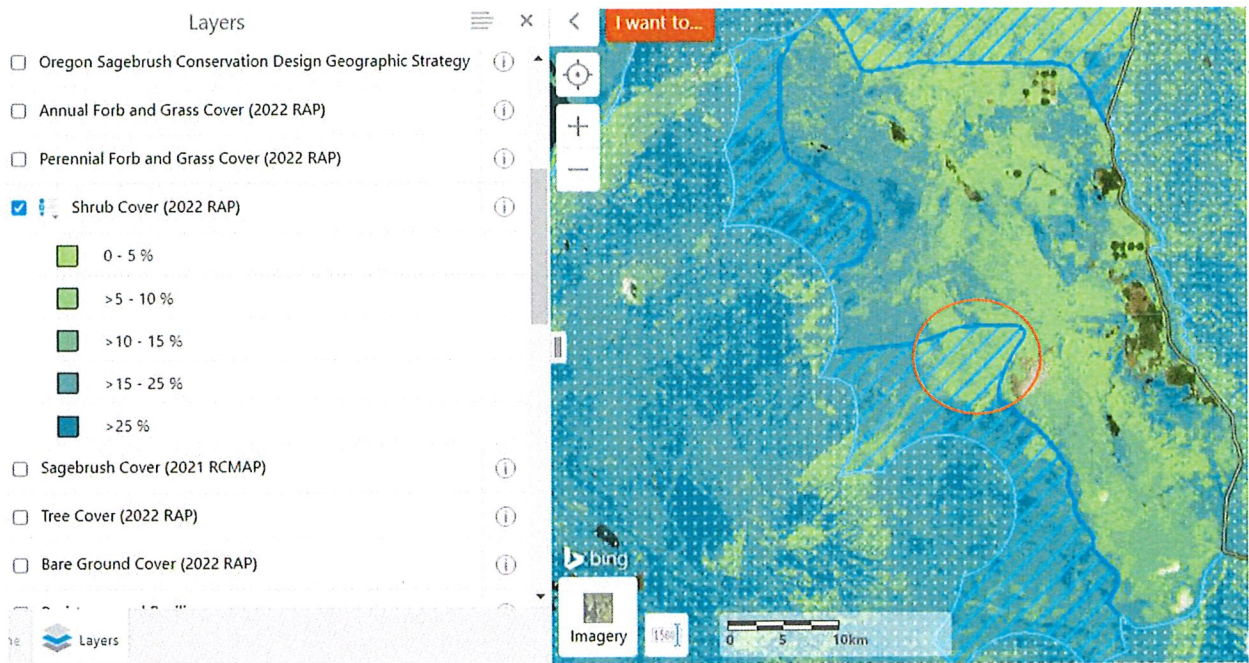


Figure 5.

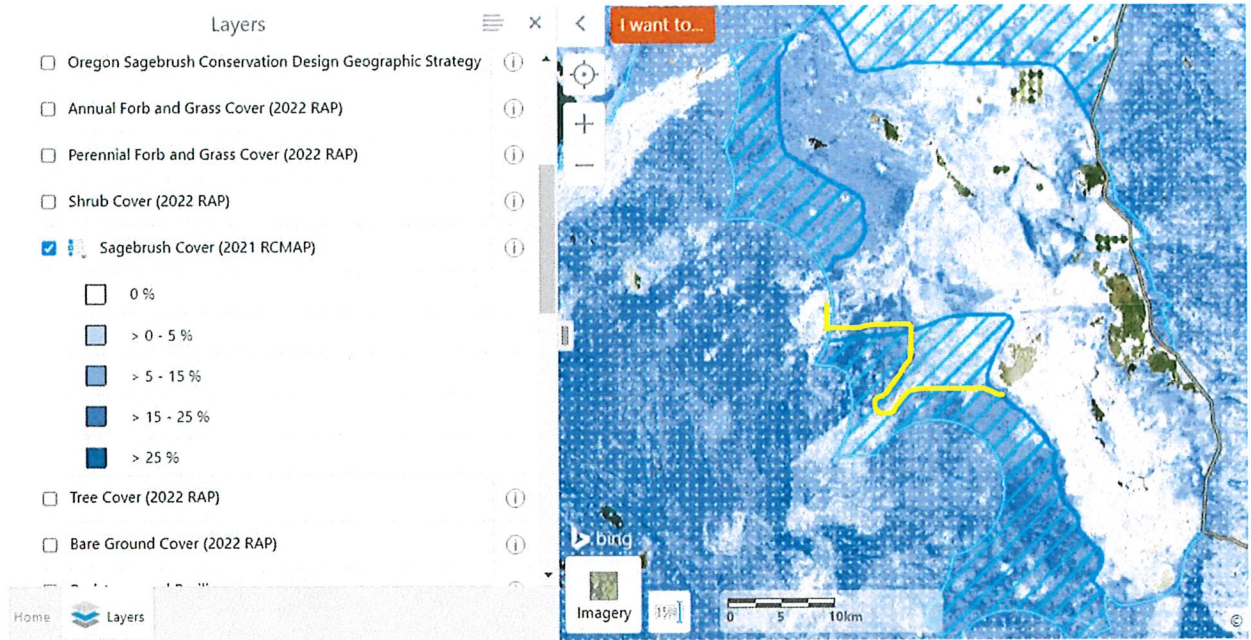


Figure 6.

4. Our fourth proposal breaks the “No Donut Hole Rule,” but we wanted to bring it up anyway for consideration. Two areas on the ranch exist as meadows in the middle of core habitat: the meadows and reservoir in Skull Creek (see Figure 7) and Hawks Valley (see Figure 8). Would these areas ever be considered for being clipped out of core? (Yellow lines indicate proposed edges of meadows to be excluded from core habitat designation).

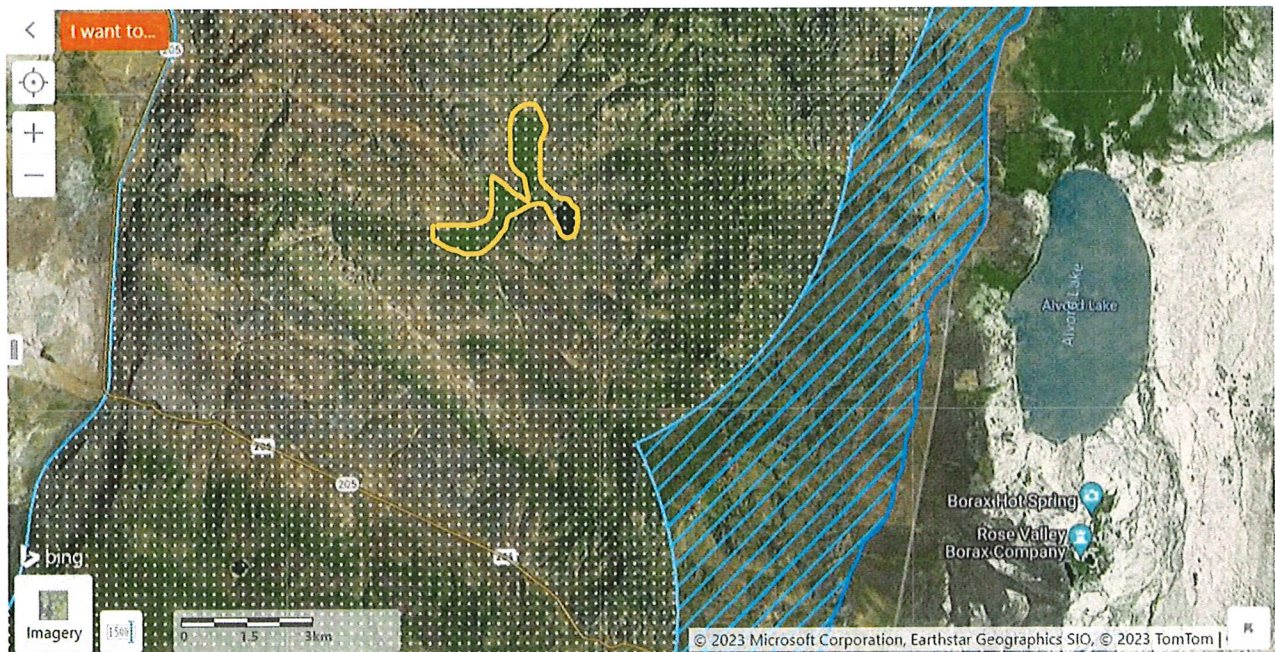


Figure 7.

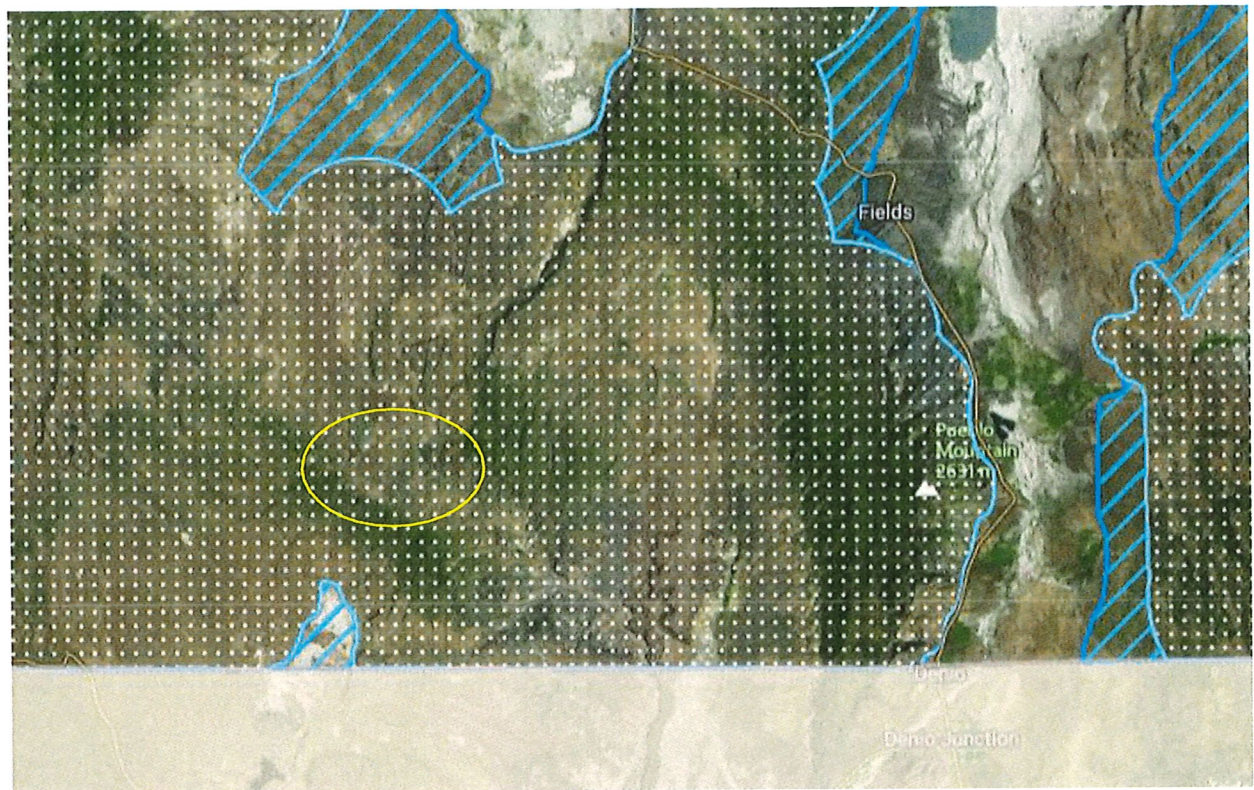


Figure 8.

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COMMENT BOX

WildLands Defense is very concerned that the existing state and federal management actions for sage-grouse do not adequately control disturbance to sage-grouse habitats. These disturbances include livestock grazing, vegetation and fuels "treatments" that fragment and destroy habitats, and mining exploration and development.

We urge ODFW to stop trying to "save" Sage-grouse by aggressively treating junipers and/or manipulating existing sagebrush communities. The ODFW crusade to destroy junipers is taking a large toll; on nesting and winter habitat for migratory birds. It is also causing expansion (irreversibly) of cheatgrass and medusahead.

Please focus manipulations, "treatments" and "fuels" actions on crested wheatgrass and woodlands. Please do not support fuel breaks that mow, roller beat, herb iced or otherwise destroy sagebrush. This just causes cheatgrass and medusahead expansion.

We are also concerned that leks in some areas are outside any PAC and not regularly monitored. For example, we encountered this in working on the Alvord allotment.

BLM is scoping a solar EIS that may cause large-scale new harm to habitats, and a plethora of

transmission lines are proposed for "renewable" energy. ODFW must work to constrain and limit these developments (and wind and geothermal developments too) in sage-grouse habitat landscapes.

DOGAMI measures for mining exploration and development are very inadequate to control damage to Sage-grouse habitats. We have observed on the ground in the McDermitt Creek landscape how poorly mining exploration is regulated – and monitored. DOGAMI seems to have no on the ground presence. and BLM is joined at the hip with the miners, ignoring degradation and violations.

We are also concerned that ODFW will claim to "mitigate" lithium mining n the McDermitt caldera. The state must stand up for mitigation by avoidance – i.e. NOT developing a project in highly sensitive Sage-grouse habitats.

We have many other concerns – including the very high density of fences and

Please see attached documents illustrating threats and serious ecological concerns/

Katie Fite

Public Lands Director

Wildlands Defense

PO Box 125

Boise, ID 83701

208-871-5738

**Attach a
File**



[solar_eis_brwwlpsolarpeis2023scoping.pdf](#) 6.92 MB • PDF

▪

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Subject: Sage-grouse Plan Revision [#5]

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COMMENT BOX

The highlighted area on the attached file is located on Cow Creek and East Cow creek.
It meets the consideration of developed agriculture areas and should be left out of the habitat designation. All other developed areas along the front range have been left out for this reason and Cow creek should be as well.

Attach a File

 [sage_grouse_map.png](#) 541.31 KB · PNG



From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, September 6, 2023 8:25 AM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Subject: Sage-grouse Plan Revision [#6]

Are you Yes
an
Oregon
resident?
(Optional)

Email mbennett1052@icloud.com

- I understand that I am agreeing to receive email messages about the Oregon Sage-Grouse Plan Revision at the email address listed above.

COMMENT BOX

Thank you for undertaking this revision and update of the plan. The inclusion of lands in south western Baker County is especially critical for not only the local bird population but for the overall count of populations. The Sage Grouse population in this area has been thriving and remains steady, this has been in large part to the leadership of ODF&W with partnerships with OWEB, NRCS, the Baker County LIT and the landowners. Additionally the connectivity between the Baker PAC and southern Baker County is crucial to maintaining the northern population and providing a pathway for birds to migrate between the areas.

Overall great job and thanks for your work in Baker County.

▪

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, September 18, 2023 11:23 AM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Subject: Sage-grouse Plan Revision [#7]

Are you Yes
an
Oregon
resident?
(Optional)

Email johnhok@hotmail.com

- I understand that I am agreeing to receive email messages about the Oregon Sage-Grouse Plan Revision at the email address listed above.

COMMENT BOX

My concerns are around the expansion of low density habitat in the low elevation on the east side of Adel.

This has historically been dry non-watered country that I doubt was ever historically occupied.

In my estimation the CORE habitat line takes in all of the viable Sage Grouse habitat in that area. Steepness, dryness and alkali flats make of most of the balance.

The concern is the early turnout Crested wheat grazing in the area allows me to do a very sound rest rotation grazing system on the native range to the east that is good sage grouse habitat.

A habitat designation that would prevent maintenance of the crested seedings could result in either increased use of the native range or less viable ranch operations.

Less viable ranches effects RFPA performance, livestock availability to manage fine fuels, livestock ability to treat IAG in the off season. Could result in development of inholdings.

I think over the long term Sage Grouse would benefit from a draw back of low density habitat in this area.

Attach a
File



[east_adel_suggested_changes_odfw_sage_grouse_habitat_09.18.23.jpg](#) 472.49 KB

JPG



From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, September 21, 2023 3:43 PM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Subject: Sage-grouse Plan Revision [#8]

Are you an Oregon resident? (Optional) Yes

Email jjlaird@zimbracloud.com

- I understand that I am agreeing to receive email messages about the Oregon Sage-Grouse Plan Revision at the email address listed above.

COMMENT BOX

Dear Committee,

I would like the commission to not adopt core areas of the new maps if there is not solid proof there are active leaks in the area. One of these areas is Juniper mountain in Lake County which is east of Alkali Lake.

I commend the committee for making revisions to the original habitat map that had serious errors such as core area on the lakebed of Bluejoint Lake among others.

Thank you for the opportunity to comment.

Sincerely,

Jesse Laird

From: Frederick, Glenn P <gfrederick@blm.gov>
Sent: Friday, September 8, 2023 9:40 AM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>; VOLD Skyler T * ODFW <skyler.t.vold@odfw.oregon.gov>; CLINE Mikal L * ODFW <Mikal.L.CLIN@odfw.oregon.gov>
Cc: Van Norman, Kelli J <kvannorm@blm.gov>; Regan-Vienop, James (Jim) <jreganvienop@blm.gov>; Folliard, Lee B <lfolliard@blm.gov>; Hruska, Jeremy J <jhruska@blm.gov>; Shirley, Matthew R <mshirley@blm.gov>; Miller, Arthur R <a1miller@blm.gov>
Subject: Re: [EXTERNAL] Oregon Sage-Grouse Habitat Update

Skyler & Mikal,

Thank you for the opportunity to review the ODFW draft revised sage-grouse core and low-density habitat maps. The Oregon State Office created an access limited online ArcGIS web map viewer for the SO and BLM wildlife biologists on Prineville, Lakeview, Burns, and Vale Districts to examine the draft map and record biologically justified comments associated with spatial polygons. Kelli and I met with each BLM District individually to review the map and comments.

The attached shapefile and Excel spreadsheet contain the BLM's comments. Please let us know if you have any questions.

Thank you

Glenn Frederick
OR/WA Wildlife Program Lead & Sage-Grouse Biologist
Bureau of Land Management
1220 SW Third Ave
Portland, OR 97204
503-808-6379
gfrederick@blm.gov

OBJECTID	Reviewer Name	ReviewerOffice
11	Kelli Van Norman	State Office
12	Kelli Van Norman	State Office
13	Kelli Van Norman	State Office
15	Kelli Van Norman	State Office
16	Kelli Van Norman	State Office
17	Melissa Yzquierdo Primus	Vale District Office
18	Melissa Yzquierdo Primus	Vale District Office
19	Melissa Yzquierdo Primus	Vale District Office
21	Dustin Mudgett	Vale District Office
22	Megan McGuire	Vale District Office
23	Megan McGuire	Vale District Office
25	Monica Ketcham	Vale District Office
26	Megan McGuire	Vale District Office
27	Dustin Mudgett	Vale District Office
28	Brie Porter	Prineville District Office
29	Brie Porter	Prineville District Office
30	Brie Porter	Prineville District Office
31	Dacey Mercer	Lakeview District Office
33	Dacey Mercer	Lakeview District Office
34	Dacey Mercer	Lakeview District Office
35	Dacey Mercer	Lakeview District Office
36	Dacey Mercer	Lakeview District Office

Comments

BLM HAF seasonal habitat maps and 2019-21 EcoState model these areas as decent habitat.

Not sure why this part of core habitat removed. Ecostate shows fairly good habitat. BLM HAF seasonal habitat

Not sure why this was cut from PAC. Ecostate shows it as still decent habitat.

Given the Ecostate class D poor condition grassland, why has this been added as core?

Make into low density habitat given the poor quality habitat (Ecostate).

Modify the low density to this corridor. This is based on HAF model for potential habitat

Terrain and HAF doesn't show as low density

Terrain and HAF does not show this as habitat.

Was this removed from Core Habitat due to density of juniper, topography, or a combination of both? This could

The Jordan Craters lava field should be removed from low density habitat. While it would cause a donut hole, p

Although this area is connected to core habitat, small slivers of habitat designations (low or core) are difficult to

Why is the open water of Upper Cow Lakes and the BLM recreation area mapped as Core?

Consider leaving this area low density due to rugged topography (slopes of the Oregon Canyon Mtns)

With Vale Bios and OSO. Taking a look at habitat quality in this area due to crested wheat grass seedings. Poor h

This Camp Creek area has high density of juniper (old and young growth). This area may need to be refined inste

High density of juniper.

High density of juniper (old growth and young growth) and very rugged country. Lower sagebrush density.

The Coleman Valley area does not have a good habitat in current condition and is not used. Could be removed fi

This area does not contain good habitat and could be removed from low density. Unless, there is a reason to inc

This area lacks viable habitat and could be removed, unless there is reason to maintain for connectivity across c

This area lacks appropriate habitat and could be removed, unless there is reason to maintain for connectivity ac

Add this area to either Core or Low Density for contiguity and to capture bird use of this area. I believe this area

Comment Action	CreationDate
2 - Add Core Habitat	8/4/2023 22:19
2 - Add Core Habitat	8/4/2023 22:49
2 - Add Core Habitat	8/4/2023 22:55
1 - Remove Core Habitat	8/4/2023 23:06
1 - Remove Core Habitat	8/4/2023 23:12
5 - Other	8/9/2023 18:49
3 - Remove Low Density Habitat	8/9/2023 19:02
3 - Remove Low Density Habitat	8/9/2023 19:05
2 - Add Core Habitat	8/14/2023 19:33
3 - Remove Low Density Habitat	8/22/2023 19:28
3 - Remove Low Density Habitat	8/22/2023 19:58
5 - Other	8/25/2023 15:34
1 - Remove Core Habitat	8/25/2023 15:37
1 - Remove Core Habitat	8/25/2023 16:34
1 - Remove Core Habitat	8/25/2023 21:54
1 - Remove Core Habitat	8/25/2023 21:56
3 - Remove Low Density Habitat	8/25/2023 22:17
3 - Remove Low Density Habitat	9/1/2023 0:23
3 - Remove Low Density Habitat	9/1/2023 0:32
3 - Remove Low Density Habitat	9/1/2023 0:36
3 - Remove Low Density Habitat	9/1/2023 0:39
2 - Add Core Habitat	9/1/2023 0:45



File Code: 2610

Date: September 22, 2023

ODFW Sage-Grouse Planning Team
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302

Thank you for the opportunity to review and comment on the Oregon's sage-grouse core and low-density habitat revisions. Although the National Forests in eastern Oregon are not dominated by sage brush and mixed shrub habitat, there are five Forests (Deschutes, Ochoco, Malheur, Wallowa-Whitman, and Fremont-Winema) that contain sage-grouse habitat on their fringes. These areas provide important connectivity to other larger tracks of habitat, as well as important habitat to specific life stages of the sage-grouse. These forests support approximately 1% of the sage grouse Core Area and 1.7% of the Low-density habitat in Oregon.

Each Forest Biologist had the opportunity to review maps at an ODFW "Sage-Grouse Habitat Update" organized meeting locations, or to meet with a local ODFW biologist and provide feedback to the mapping updates. The U.S. Forest Service understands the importance of the habitat mapping updates. It is imperative that we use the new data from the past 12 years, with the knowledge of sage-grouse distribution and habitat requirements through the discovery of over 150 new leks, development of new habitat suitability maps, and through sage-grouse research projects, which have generated spatial habitat use and movement data from radio- and GPS-marked birds. The U.S. Forest Service supports ODFW's proposed habitat mapping updates and the intention of these changes to inform and revise the Oregon Sage-Grouse Conservation Assessment and Strategy (CAAS).

In addition, the U.S. Forest Service understands the need to update the Core Areas and CAAS as it will coincide with the Bureau of Land Management's (BLM) amendments to the range wide sage-grouse Approved Resource Management Plan (ARMP), which guides the majority of sage-grouse habitat conservation and restoration on BLM-managed land in 10 Western states.

Lastly, one of the major threats to this species is habitat connectivity and impact from land use development. It is important to look at all lands within the range of this species. Therefore, updates to Core and Low-density habitat information are important to inform the Land Conservation and Development Commission, limiting impacts to counties from development that could conflict with the conservation of sage-grouse habitat.



We commend ODFW's Sage-Grouse Planning Team on their commitment to conserve the viability of this species and coordinating this effort with the public and public agencies.

DANIEL
SHIVELY

Digitally signed by
DANIEL SHIVELY
Date: 2023.09.22
11:47:47 -07'00'

DANIEL SHIVELY
Director, Natural Resources

cc: Leslie Hay, John Chatel, Monty Gregg

From: Powder River Sportsmen's Club <info@prsportsmen.com>
Sent: Friday, September 22, 2023 1:22 PM
To: SageGrouse Plan * ODFW <sagegrouse.plan@odfw.oregon.gov>
Subject: Public comment on proposed 2023 GRSB PAC boundaries

You don't often get email from info@prsportsmen.com. [Learn why this is important](#)

Sage grouse stay about 3km away from highways. Maybe more.

Eight citations:

1 - Connelly et al evaluated 804 leks within 100 km of I-80 in Wyoming and Utah. No leks were located within 2 km of either side of the highway. Only nine leks were located within 4 km. Distance from the highway was a significant predictor of lek activity: activity declined faster at leks within 7.5km compared to leks located between 7.5 and 15km from I-80.

Connelly JW, Knick ST, Schroeder MA, Stiver SJ and Wildlife Agencies. "Conservation assessment of greater sage-grouse and sagebrush habitats." (2004).

<https://wdfw.wa.gov/publications/01118>

2 - Knick et al evaluated 3,184 lek locations across 920,000 km² to model minimum habitat characteristics essential to sage grouse persistence. Sage grouse abandon leks when the density of highways located within 5km exceeds 50 meters per km², or when the density of interstate highways located within 5km exceeds 10 meters per km².

Knick ST, Hanser SE, Preston KL. "Modeling ecological minimum requirements for distribution of greater sage-grouse leks: implications for population connectivity across their western range, U.S.A." Ecology and Evolution 3 (2013): 1539 - 1551.

<https://onlinelibrary.wiley.com/doi/epdf/10.1002/ece3.557>

3 - Wann et al, in collaboration with BLM, evaluated 6,615 lek locations across the U.S. sage grouse range to model habitat characteristics most conducive to lek persistence. Some environmental factors influenced lek persistence in consistent ways across the entire range of habitat, whereas other environmental factors exhibited regional variation in degree of influence. For example, encroaching pinyon/juniper may serve as sage grouse roosts in some areas, whereas the presence of >16 meters per km² of major road surface within 3.2km of habitat predicts lek extirpation everywhere within sage grouse range. Major roads are negatively associated with lek persistence regardless of adjacent landscape conditions. Distance matters: nearby disturbances impact bird behavior more than distant disturbances.

Wann GT, Van Schmidt ND, Shyvers JE, Tarbox BC, McLachlan MM, O'Donnell MS, Titolo AJ, Coates PS, Edmunds DR, Heinrichs JA, Monroe AP, Aldridge CL. A regionally varying habitat

model to inform management for greater sage-grouse persistence across their range. *Global Ecology and Conservation*. 2023; 41.

<https://www.sciencedirect.com/science/article/pii/S2351989422003511>

4 - Holloran: male lek attendance was significantly diminished by the presence of oilfield main haul roads within 3 km of leks. Attendance rates were negatively associated with traffic volume and also road length greater than 5 km.

Holloran MJ. "Greater sage-grouse (*centrocercus urophasianus*) population response to natural gas field development in western Wyoming." (2005).

<https://www.oilandgasbmps.org/docs/WY030-HolloranSageGrouseStudy.pdf>

5 - Aldridge et al observed that female Gunnison grouse avoid nesting in proximity to BLM Class 1 and Class 2 roads. At the patch scale, threshold response curves indicated very low probability of nest occurrence within 8 km of major roads, and sharply higher probability at distances greater than 8 km from major roads.

Aldridge C, Saher D, Childers T, Stahlnecker K, Bowen Z. "Crucial nesting habitat for Gunnison sage-grouse: A spatially explicit hierarchical approach." *J of Wildlife Management*. 2012; 76:391-406.

https://www.researchgate.net/publication/258022078_Crucial_nesting_habitat_for_gunnison_sage-grouse_A_spatially_explicit_hierarchical_approach

6 - Tack demonstrated that proximity to roads is negatively associated with lek occurrence. The impact of roads within 3.2km is detrimental for all leks, but comparatively more pronounced for large leks with 25 or more birds.

Tack, JD. "Sage-grouse and the human footprint: implications for conservation of small and declining populations." (2009). *University of Montana Graduate Student Theses, Dissertations, & Professional Papers* #856.

<https://scholarworks.umt.edu/etd/856/>

7 - Berkeley et al: At the landscape scale, distance to nearest road is a primary variable affecting sage grouse selection of nest sites. Hens select nest sites farther away from county roads and highways compared to two-track roads, and avoid landscapes that have a higher density of gravel or paved roads.

Berkeley L, Szczypinski M, Helm J, Dreitz V. "Sage Grouse Grazing Project - Fiscal Year 2019 Annual Progress Report." *Montana Fish, Wildlife, 7 Parks W-158-R*.

https://fwp.mt.gov/binaries/content/assets/fwp/conservation/wildlife-reports/sage-grouse/2019aug_sagegrouse_progress_report_finall.pdf

8 - Lyon et al: Light traffic disturbance of 1-12 vehicles per day during the breeding season may reduce sage grouse nest-initiation rates and increase distances moved from leks during nest site selection.

Lyon AG, Anderson SH. "Potential Gas Development Impacts on Sage Grouse Nest Initiation and Movement." Wildlife Society Bulletin. 2003;31(2):486–91.

<http://www.jstor.org/stable/3784329> also

<http://eqc.state.wy.us/orders/Land%20Closed%20Cases/11-4803%20Lost%20Creek%20ISR,%20LLC/Exhibit%2015.pdf>

Some interesting observations from the above works:

- 1 - Sage grouse are unlikely to resume use of highway habitat regardless of landscape conditions adjacent to the highway.
- 2 - Distance matters. Nearby disturbances impact bird behavior more than distant disturbances.
- 3 - Persistence and health of large leks (25+) is an important bellweather. Persistence at large leks may be more impacted by human disturbance than at sporadically-visited small leks.
- 4 - Wind amplifies noise disturbances in the downwind direction while muting them in the upwind direction. This phenomenon may be relevant to sage grouse behavior near human development.

Road traffic counts undoubtedly matter:

<https://www.oregon.gov/odot/data/pages/traffic-counting.aspx> .

The Annual Average Daily Traffic (AADT) count on I-84 near Huntington is almost 12,000.

The AADT count on Hwy 26 at Brogan, Oregon is 444.

Brogan is noteworthy. On your proposed 2023 PAC overlay, it represents a "finger incursion" of non-viable sage grouse habitat drawn into the boundary of that PAC. The land in that finger was probably good GRSG habitat 200 years ago, but it's not now, and your proposed PAC boundary accommodates that reality. That is the kind of public policy people can get behind.

Our recommendation: ODFW evaluate traffic counts and density of adjacent anthropogenic disturbances at each instance where a highway enters a PAC, and draw additional fingers or corridors as warranted to accommodate the reality that pre-established anthropogenic activity adjacent to busy highways almost certainly constitutes non-viable sage grouse habitat and thus should not be drawn into PAC's.

PAC boundaries create restrictive zones for humans. Once a PAC boundary is established, human activities anywhere within the PAC are subject to arbitrary restrictions, regardless of whether such restrictions actually benefit safe grouse.

If non-viable sage grouse habitat is included in PAC boundaries, no incremental conservation objective is achieved, but more human activity becomes subject to arbitrary restrictions, which leads more people to recognize some such restrictions as senseless and ineffective, which undermines public support for the conservation program. A "lose-lose" proposition.

Example:

Virtue Flat Shooting Range (VFR) in Baker County on Hwy 86, AADT count ~900.

VFR was constructed in 1968.

The BLM lease for the VFR land expired 2022, and is undergoing renewal in 2023.

No sage grouse have been documented on or within a mile of VFR since before 1950.

Because VFR is in the Baker PAC, and within 2 miles of occupied leks, BLM wants to add new terms to the VFR lease that ban human activity at VFR for the first and last two hours of each day from March 1 to June 30, and possibly other months as well.

We are asking BLM to remove those stipulations from our lease because VFR is located less than 1km from Hwy 86, and it makes no sense to attempt to attract sage grouse back to disturbed habitat by establishing a few morning and evening quiet times alongside a busy highway.

If BLM denies our request, we intend to appeal. Our strategy will include a statewide humor campaign where we try to make at least 2 million people laugh at ridiculous things.

Hopefully this contest will not take place; it wouldn't be good for the sage grouse conservation initiative.

One way to avert it would be for ODFW to draw a few PAC fingers that exclude non-viable habitat (which is a good idea no matter how you look at it), and maybe tell BLM (asap) that those ideas are being considered.

This might entice BLM to delay and reconsider their response to our request, which ultimately could be a win-win for everyone.

We nominate Hwy 86 at Virtue Flat as a candidate for a finger drawn into the Baker PAC boundary.

This finger will not impair the effectiveness of GRSR habitat restoration in the PAC, but it will help avert public backlash against ineffective and unnecessary restrictions placed on pre-existing recreational facilities located on non-viable habitat along Hwy 86.

An alternate idea: perhaps ODFW could contrive a third classification for sage grouse habitat: "In PAC but non-viable thus not subject to *some* PAC provisions."

If you went that way, you might draw a 2km wide "partial exemption" corridor centered on every 300+ AADT paved highway in every PAC, which is not an unreasonable thing to do. Won't hurt the bird, will make quite a few people less wary.

FYI - Our Club intends to continue our noxious weed program, commence a new program for replacing annual invasive grasses with native species, eliminate GRSG predator roosts and subsidies, contribute to LIT discussion, and volunteer manpower for local GRSG conservation projects.

On behalf of the 550 Sportsmen, thank you for your time and consideration of this email.

As a courtesy, please have your system or staff respond so that we know it was received.

Regards,

David Spaugh

Secretary

Powder River Sportsmen's Club

541-519-7417

On September 29th through October 11th, the ODFW Sage-Grouse Planning Team received the following comments from 79 members of the Powder Basin Sportsmen's Club, listed below. Eight of the individual responses varied from this comment and are listed separately, below.

"Dear ODFW,

The new sage grouse PAC boundaries should exclude areas of pre-existing human development and activity at points where highways enter PAC's, because those areas are non-viable for sage grouse habitat.

Sage grouse will not use habitat near highways, especially when pre-PAC development and human activity are present adjacent to the highway.

Including such areas in PAC boundaries will not achieve any conservation objective, but it will invite conflict and undermine public support for the sage grouse conservation initiative.

Look at Brogan, west of Vale.

What about Hwy 86, east of Baker?

Thank you."

These comments were received from:

Brody Charpilloz <chrpllz@yahoo.com>
Ryan Lee <brklyr75@gmail.com>
Nathan & Kate Wilson <natekatewilson@gmail.com>
Wayne and Marilyn Bloom <wmbloom77@msn.com>
Brian West <beavernation01@yahoo.com>
petitclerc lara <laradenne@yahoo.com>
Noel Scott <highmarkrmk@eoni.com>
Dan Weitz <weitzconw@gmail.com>
Geo Kini <geokini@yahoo.com>
ALAN ELSBERRY <ajelsberry@msn.com>
Mary Trowbridge <mb.fair50@gmail.com>
pat neill <pneill1234@gmail.com>
Bill Harmon <billharmon38s@gmail.com>
Nolan Sieg <nolansieg@gmail.com>
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Wayne Harvey <wayneharvey94@gmail.com>
Todd Taylor <taylorstech95@gmail.com>
Shannon & Whitney <swblack@thegeo.net>
Joe Rosa <joerosa11@gmail.com>
Steve Moore <steve904man@gmail.com>
Wolfgang Platzer <wolfgang.platzer@gmail.com>
Dale Heath <daleehealth@gmail.com>
Vince Stonis <vincestonis@gmail.com>
Don Christian <djchristian63@gmail.com>
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ZACK DOWNING <ztdowning@msn.com>
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James R Hawkins/Tetherow Tex LaRue <halfdraq@gmail.com>
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Tom Dzieman <tdzieman@hotmail.com>
Keith Hale <k.m.hale@hotmail.com>
Daniel <iktomepirate@hotmail.com>
Kody and Heidi Justus <kodyandheidijustus@yahoo.com>
Dennis Hynek <dhynek47@gmail.com>
Patrick mckaig <pmckaig1@mac.com>
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j. brooks <jdbrooks@eoni.com>
Bob Seldon <bob@seldon.com>
Elwood Wirth <egwirth@eoni.com>
Dave Turner <turner.dave27@gmail.com>
Mary Hogan <oregongal08@yahoo.com>
Pete Ray <pray2506@hotmail.com>
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Richard Oulman <richo877@gmail.com>
Ann Kniesel <kniesel@thegeo.net>
ron palmlblad <rkpalmlblad@yahoo.com>
steven linnemeyer <stevenr1954@msn.com>
Keith and Lynn Magnuson <kamagnus@eoni.com>
Ken <skuzzyspot@comcast.net>
Adam Brooks <brooksaj2@gmail.com>
Susan Freeman <roper.sue03@gmail.com>
Brian Haberle <brian@orchardwoodproducts.com>
Corey Denlinger <denlingerb@aol.com>
Christina Wood <cwood@thegeo.net>
Chris Elliott <cnelliott1989@gmail.com>
Wade Palmer <whisperinwade@gmail.com>
Ryan Elms <ryanelms1495@gmail.com>
Keith Hale <k.m.hale@hotmail.com>

From: Raymond Sohn <sohnr@gmail.com>

Sent: Friday, September 29, 2023 4:26 PM

To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>

Subject:

You don't often get email from sohnr@gmail.com. [Learn why this is important](#)

Please reevaluate the restrictions on hyw. 86 east of baker. We are to close to the Hwy to havw an impact on grouse. I gave not ever seen a sage grouse in this area. So....what is the reasoning behind this?

Ray Sohn

Sportsman club member

Baker City

From: emurrell@eoni.com <emurrell@eoni.com>

Sent: Friday, September 29, 2023 5:29 PM

To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>

Cc: VOLD Skyler T * ODFW <Skyler.T.VOLD@odfw.oregon.gov>; info@prsportsmen.com

Subject: Sage Grouse Habitat Maps

Importance: High

You don't often get email from emurrell@eoni.com. [Learn why this is important](#)

Dear ODFW,

The new sage grouse PAC boundaries should exclude areas of pre-existing human development and activity at points where highways enter PAC's, as those areas are non-viable for sage grouse habitat. Sage grouse will not use habitat near highways and especially when pre-PAC development and human activity are present adjacent to the highway.

Look at Brogan, west of Vale. And even more specifically, Hwy 86, east of Baker.

I trust that with just a little further research it would be agreed that during the current map revisions boundary lines should be redrawn to more accurately define critical habitat zones, which are away from highways and areas of human activity. To continue to include such areas in PAC boundaries will not achieve any desired conservation objectives, but will instead invite conflict and further undermine public support for the sage grouse conservation initiative.

Thank you for your consideration in this matter.

Esa Murrell

From: guns@templincomputing.net <guns@templincomputing.net>
Sent: Saturday, September 30, 2023 11:00 AM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Cc: VOLD Skyler T * ODFW <Skyler.T.VOLD@odfw.oregon.gov>; info@prsportsmen.com
Subject: Suggested changes to PAC boundaries

Some people who received this message don't often get email from guns@templincomputing.net. [Learn why this is important](#)

Dear those on the Committee,

Even though I am not a Oregon state resident I am a hunter education instructor for the State of Washington. We run into these types of questions and issues all the time in teaching our classes.

As such I am suggesting and asking that the committee consider redrawing the PAC boundaries to exclude the existing human and highway zone that research has shown are not in use by the sage grouse anyway. Doing so will reduce the interactions and issues for related businesses and human habitation.

All available studies show that sage grouse will not use habitat within 2-miles of highways, especially when human activity are present adjacent to the highway. Including such areas in PAC boundaries will not achieve any tangible conservation objectives, but it will invite conflict between achieving conservation goals and existing activities, as well as undermine public support for the sage grouse conservation initiative. Other such districts in use have already used these exclusions to reduce the conflict. We are asking the committee to do the same with the current planned zone.

Thank you for your attention and consideration.

Paris Templin

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From: Greg Brown <siftndirt@hotmail.com>

Sent: Saturday, September 30, 2023 7:38 AM

To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>

Subject: Re your revised sage grouse plan

You don't often get email from siftndirt@hotmail.com. [Learn why this is important](#)

We hope common sense will work its way into this plan. There is no valid reason to include areas currently resided upon or actively used by the public along highways. The birds are important, but hopefully we've learned from the spotted owl fiasco that restrictions for their own sake do not protect wildlife without dire consequences. Over regulating or blanket rules cause more people to violate them whether knowingly or unknowingly and either way creates greater lack of desire to comply and less respect for the rule of law. That alone is a bigger issue today which hopefully you will not enhance.

Greg Brown

Baker City, OR

From: dark_sky@charter.net <dark_sky@charter.net>

Sent: Saturday, September 30, 2023 1:22 PM

To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>; VOLD Skyler T * ODFW <Skyler.T.VOLD@odfw.oregon.gov>; info@prsportsmen.com

Subject: Revision of Sage Grouse PAC boundary to Exclude Preexisting Human Development Areas

Some people who received this message don't often get email from dark_sky@charter.net. [Learn why this is important](#)

"Dear ODFW,

I am writing to express my desire for the current revision of the Prairie Grouse PAC, (Priority Area for Conservation) to EXCLUDE areas of preexisting human development where highways enter the PAC because these areas are NOT viable for Sage Grouse habitat. The grouse will not use these areas and including them in the PAC will not accomplish any conservation objective.

I understand that ODFW has already drawn "exclusion fingers" in some PACs such as Brogan, west of Vale.

I would appreciate your consideration of additional fingers where highways enter PAC boundaries; such as Highway 86 east of Baker.

Thank you ,

Tom Peterson, Central Point, OR

From: fisherco@earthlink.net <fisherco@earthlink.net>
Sent: Sunday, October 1, 2023 2:14 PM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Cc: VOLD Skyler T * ODFW <Skyler.T.VOLD@odfw.oregon.gov>; info@prsportsmen.com
Subject: Virtue Flat Shooting Range - Please Exclude from well-intended Sage Grouse PAC boundaries

Some people who received this message don't often get email from fisherco@earthlink.net. [Learn why this is important](#)

Gentlemen & Ladies of ODF&W

Sage grouse PAC boundaries should exclude areas of pre-existing human development and activity especially where highways enter PAC's.

I understand Sage grouse do not use habitat near highways, especially when development and human activity are present adjacent to the highway, as at the Virtue Flats.

Including such areas in PAC boundaries will not achieve any measurable conservation objective IMHO, although it may look like progress to the uninitiated....

Thank You,

John A. Fisher

48154 Foothill Road

Haines OR 97833

Cell: 650 400-3396

fisherco@earthlink.net

Note: This message and any documents accompanying it contain information belonging to the sender which is legally privileged. This information is intended for the use of the individual or entity named above. Any disclosure, copying, distribution or the taking of any action in reliance on this information is strictly prohibited.

From: Tom <tom@mylionmail.com>
Sent: Tuesday, October 3, 2023 12:26 AM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Cc: VOLD Skyler T * ODFW <Skyler.T.VOLD@odfw.oregon.gov>
Subject: Sage grouse PAC areas

You don't often get email from tom@mylionmail.com. [Learn why this is important](#)

Dear ODFW,

As you are adjusting PAC boundaries, please consider that sage grouse seek quiet areas to live. They stay miles away from roads to avoid predators they can't hear coming, and they need to hear each other's sounds.

Adding noise restrictions on human activities that have existed near roads for decades has no wildlife preservation benefits. Grouse already avoid the areas. If you restrict or shut down the human activities the grouse will continue to avoid because of the constant road noise. Thus, no benefits to the birds and harm to the people. The people will lose interest in otherwise worthwhile preservation actions. Please exclude these activities adjacent to roads from the PAC restrictions.

Thank you for your time.

Tom Hope

From: Dogman200@comcast.net <Dogman200@comcast.net>
Sent: Wednesday, October 4, 2023 10:09 PM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Subject: Sage Grouse habitat: and comment based experience.

You don't often get email from dogman200@comcast.net. [Learn why this is important](#)

"Dear ODFW,

The new sage grouse PAC boundaries should exclude areas of pre-existing human development and activity at points where highways enter PAC's, because those areas are non-viable for sage grouse habitat.

Sage grouse will not use habitat near highways, especially when pre-PAC development and human activity are present adjacent to the highway.

Including such areas in PAC boundaries will not achieve any conservation objective, but it will invite conflict and undermine public support for the sage grouse conservation initiative.

ODFW has already drawn "exclusion fingers" in some PAC's, such as Brogan, west of Vale.

I ask that you consider drawing more of those exclusion areas at other places where highways enter PAC boundaries, such as Hwy 86 east of Baker.

Thank you."

My Comment:

I hunted sage grouse on Steens Mountain for several years.

Toward the end of my being able to do this a concrete road was built through the area. It cut the hunting area I used about in half and made the area more accessible to tourist driving through. At that time I was aware of the effect of habitat changes on the sage hen population.

So was ODF.

In have no idea why that road was allowed. If that road is still allowed I don't understand why these PAC boundaries are being drawn as was mentioned above. I really don't want to believe there is politics involved; but it does seem suspicious given my personal experience on Steens Mountain.

Lloyd Fenwick

1205 NW 21st Street

Albany, Oregon

97321

From: Nicole Mardell <Nicole.Mardell@deschutes.org>
Sent: Wednesday, October 11, 2023 5:14 PM
To: VOLD Skyler T * ODFW <Skyler.T.VOLD@odfw.oregon.gov>; Peter Gutowsky <Peter.Gutowsky@deschutes.org>
Cc: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Subject: RE: Sage-Grouse Habitat Update

You don't often get email from nicole.mardell@deschutes.org. [Learn why this is important](#)

Thanks Skyler – we don't have any comments on the map changes themselves, but are more interested in any development regulation changes that come out of the CAAS process. We'll take a look at those chapters as they are posted and let you know if we have any questions or comments.

Best,

Nicole



Nicole Mardell, AICP | Senior Planner – Long Range

Deschutes County Community Development

117 NW Lafayette Ave | Bend, Oregon 97703

Tel: (541) 317-3157 | www.deschutes.org/cd



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Disclaimer: Please note that the information in this email is an informal statement made in accordance with DCC 22.20.005 and shall not be deemed to constitute final County action effecting a change in the status of a person's property or conferring any rights, including any reliance rights, on any person.

From: Scott Hartell <shartell@union-county.org>

Sent: Monday, October 16, 2023 10:46 AM

To: VOLD Skyler T * ODFW <Skyler.T.VOLD@odfw.oregon.gov>; panderes@union-county.org;
dbeverage@union-county.org; mscarfo@union-county.org

Cc: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>

Subject: RE: Sage-Grouse Habitat Update

You don't often get email from shartell@union-county.org. [Learn why this is important](#)

Skyler,

Thanks for working with me to get the draft map information. I have reviewed the draft map and have no concerns with the proposed changes.

Scott Hartell

Union County Planning Director

1001 4th St. Suite C

La Grande, OR 97850

(541) 963-1014

From: Holly Kerns <hkerns@bakercountyor.gov>
Sent: Monday, October 16, 2023 5:16 PM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Cc: Christina Witham <cwitham@bakercountyor.gov>; Morgan Solomon <msolomon@bakercountyor.gov>
Subject: Sage Grouse Map Update Comments

You don't often get email from hkerns@bakercountyor.gov. [Learn why this is important](#)

Good Afternoon,

I appreciate the opportunity to review the proposed updates to the Sage-grouse habitat maps. I noticed the unincorporated community of Keating is included in the core habitat area, and I would recommend removing it. The community is small, but does include a school and several homes. The community is in Township 8 South, Range 42 East, Section 17, and a map is attached. Let me know if you have any questions.

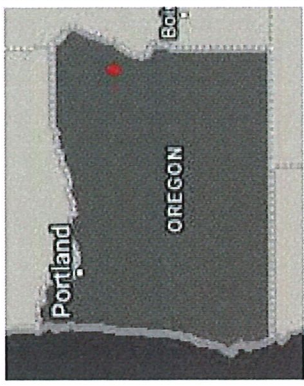
Thank you!

Holly Kerns



OREGON EXPLORER

Map

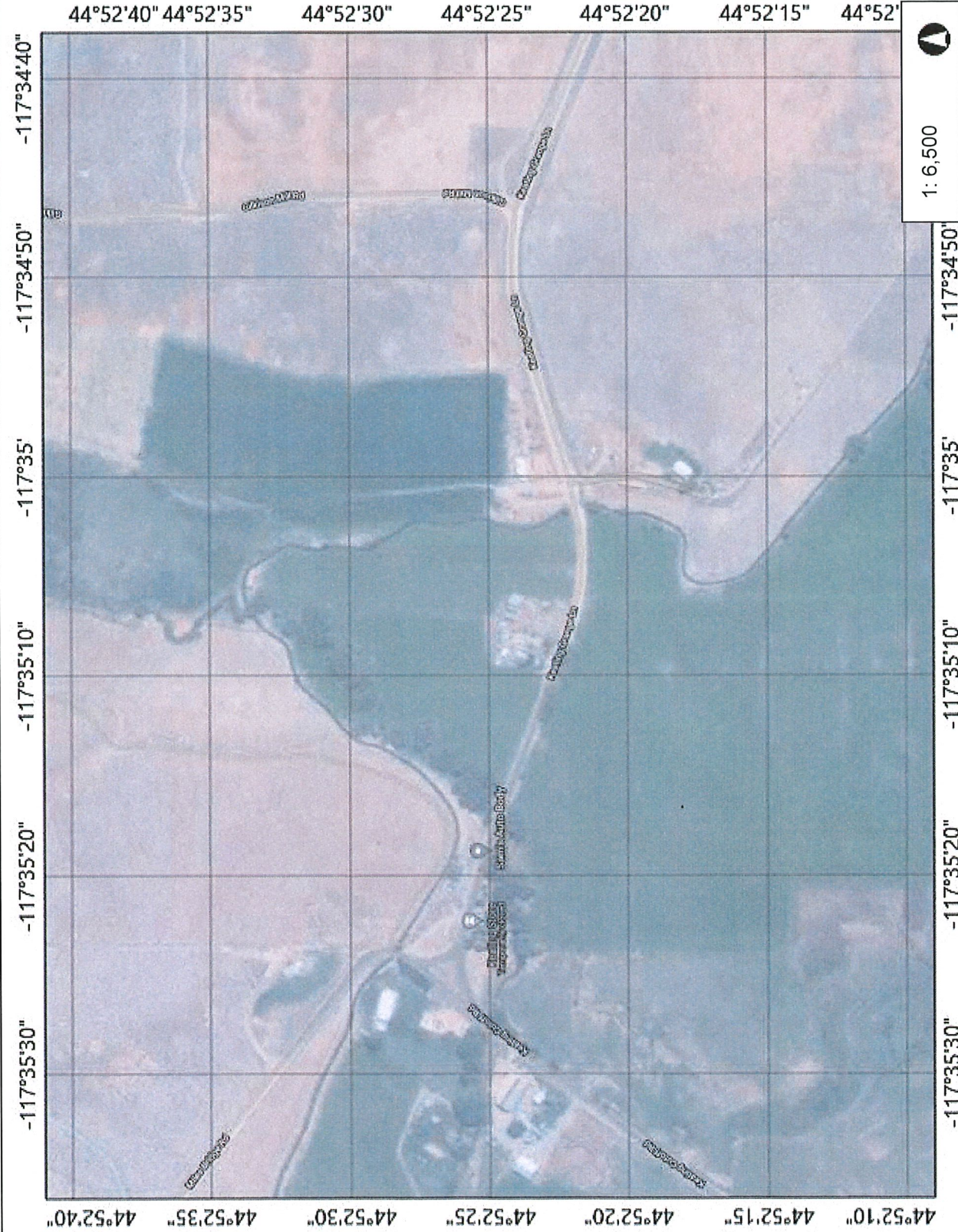


Legend

- DRAFT 2023 Sage-Grouse Core Habitat (PACs)
- DRAFT 2023 Sage-Grouse Low Density Habitat

Notes

Add your notes here



1: 6,500



This map is a user generated static output for reference only from: [SageCon.Landscape.Planning.Tool](#)

Data layers that appear on this map may or may not be accurate, current, or reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

From: Hagen, Christian <Christian.Hagen@oregonstate.edu>
Sent: Wednesday, November 15, 2023 1:27 PM
To: SageGrouse Plan * ODFW <sagegrouse.plan@odfw.oregon.gov>
Subject: Core Area Mapping Comments

You don't often get email from christian.hagen@oregonstate.edu. [Learn why this is important](#)

To whom it may concern:

Please find attached a letter offering comments on the updated Core Area Mapping effort by ODFW.

Thank you for the opportunity to comment.

Christian A. Hagen, Ph.D.

Associate Professor

Oregon State University

19460 Rudi Rd

Bend, OR 97703

Cell: 541-410-0238

<http://agsci-labs.oregonstate.edu/hagen/>



Oregon State
University

**Fisheries, Wildlife and
Conservation Sciences**

Oregon State University
104 Nash Hall
Corvallis, Oregon 97331

P 541-410-0238

christian.hagen@oregonstate.edu

Oregon Department of Fish and Wildlife
c/o Sage Grouse Habitat Planning Team
4034 Fairview Industrial Dr SE
Salem, OR 97302

To whom it may concern:

13 November 2023

I am providing this letter to assist the Oregon Department of Fish and Wildlife (ODFW) in its mission to conserve greater sage-grouse through their Core Area Policy. In particular, with regards to the recent efforts to update their original mapping efforts developed in 2011. First, I will provide some general insights to the science of the approach and will follow that will some detailed information from ongoing research being conducted in my lab at Oregon State University.

The Core Area concept was developed in Wyoming to assist with landscape scale planning of oil and gas exploration and extraction (Doherty et al. 2011) in an effort to minimize the potential impacts of such development to critical sage-grouse habitats and populations. Shortly thereafter other states, Oregon included (ODFW 2011), adopted the Core Area approach to facilitate improved targeting of conservation efforts. In Oregon, for example implementation of the Core Area concept refined the focus of conservation to 90% of the birds but occurring within only 38% of the species distribution.

Subsequent empirical field-based assessments of the Core Area concept have generally found that Cores capture more than 90% of radiomarked sage-grouse location data (Fedy et al. 2012). Arguably, in some of the populations with migratory (i.e., seasonal movements > 8 km) tendencies the Cores may have only captured ~ 70% of radiomarked sage-grouse location data (Fedy et al. 2012, Smith et al. 2016). The bottom line is the science developed ~14 years ago, still holds and various assessments have demonstrated a body of evidence that such an approach encapsulates the vast majority of the species life history stages and maintain populations (Gamo and Beck 2017).

Here in Oregon, we have built on ODFW's initial assessment of 2011 which contained only 5,719 telemetry locations. My research team has been tracking sage-grouse with standard VHF (2009-2013) and GPS-PTTs (2013-present) transmitters for nearly 15 years. We have assembled a database of over 710,000 locations across four study areas (see attached map, Figure 1) in that time frame including the Warners PAC (2009-2021),

Trout Creeks PAC (2013-2023), Brothers PAC (2022-present) and Paulina PAC (2022-present). From those data, we have found some regional and seasonal variation, but overall 98.9% of locations occur in Core, ~0.5% in Low Density, and another ~0.5% outside either designation (Table 1). From all of these locations, females marked in Brothers and Paulina exhibit greatest propensity to use areas outside of Core (8%), especially during Summer (11%) and Fall (14%). Comparatively, >97% of all locations from Warners and Trout Creeks occurred in Core regardless of season of use. This differentiation in use is driven in part by the fact that Brothers and Paulina are relatively low in elevation, and lack higher elevation topographical features and habitats that are often key in late summer and in fall transitional habitat use. Conversely, birds of the Warners and Trout Creek Mountains are largely self-contained with short seasonal movements (<8 km) mostly following an elevation gradient.

Seasonal movements that were more reflective of migratory movement and use of habitat are best exemplified by a 6 females and 3 male sage-grouse from the Brothers and Paulina PAC. These birds made extensive movements from breeding to late summer ranges. These females moved >35 km straight line distances and males moved > 20 km between these seasonal ranges this equates to round trip migrations of between 40 and 140 km. There were 3 females that moved westward 20-35 km (one-way) from area known as Todd Well (north of Hwy 20, and northeast of Brothers) to Bear and West Butte where they raised their broods. Three females and one male captured near an area known as Scabrock moved between 18 and 35 km south to irrigated fields of near Fort Rock and Christmas Valley. One female is noteworthy she traversed presumably primarily on foot through the lava flows known as Devils Garden. A male marked near Benjamin Lake (south of Hwy 20, near Hampton) made an exceptional one-way movement of 70 km east to irrigated agricultural fields nearby Riley (see attached list for details on each individual).

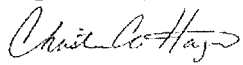
The movements documented in the Brothers and Paulina PAC demonstrate the importance of identifying Connectivity (i.e., Low Density) habitats for conservation and mitigation purposes, as many of those extreme movements were captured by those designations. Notably, movements from Scabrock into the Christmas Valley/Fort Rock region in 2022 have already been used to update and refine Low Density of the proposed map. The male movement to Riley, however, is completely outside of any designation and that movement corridor should be included when finalizing these maps. I recognize this is based on a single individual; however, it is important to note that sage-grouse males are typically in small flocks throughout the year, and this male is likely representative of a larger group, and an important linkage between known habitats and a region in which leks have disappeared over the past decade.

To close, ODFW's implementation of Core Area Policy that was developed 12 years ago

was based on the best available science at the time. That science has stood the test of time, and has been further substantiated by the science developed since then. The work of my team has identified the importance of both the Core and Low Density areas delineated by ODFW, and has shed light on at least one new corridor that will be important to include in the revised maps.

Please feel free to contact me directly if there are further questions or information needs as it relates to the work of my team and ODFW efforts to further improve the updated Core Area mapping effort.

Respectfully,

A handwritten signature in cursive script, appearing to read "Christian A. Hagen".

Christian A. Hagen, Ph.D.
Senior Research Faculty

ATTACHMENTS

Literature Cited

Doherty, K.E., D.E. Naugle, H. Copeland, A. Pocewicz, and J. Kiesecker. 2011. Energy development and conservation tradeoffs: systematic planning for sage-grouse in their eastern range. Pp 505-516 *in* S. Knick and J. Connelly. Greater Sage-Grouse: Ecology and Conservation of Landscape Species and its Habitat. Studies in Avian Biology 38. University of California Press, Berkeley, CA.

Fedy, B.C., C.L. Aldridge, K.E. Doherty, et al. 2012. Interseasonal movements of greater sage-grouse, migratory behavior, and assessment of the core regions concept in Wyoming. *Journal of Wildlife Management* 76: 1062-1071.

Gamo, R.S., and J.L. Beck. 2017. Effectiveness of Wyoming's core areas: influences on energy development and male lek attendance. *Environmental Management* 59: 189-203.

Smith, K.T., J.L. Beck, and A.C. Pratt. 2016. Does Wyoming's core area policy protect winter habitats for greater sage-grouse? *Environmental Management* 58: 585-596.

List of individual bird movements

North of Hwy 20

- 3600 (female): traveled 35km from Todd Well lekking area to Bear Creek Butte for nesting in 2022 and 2023 (she will fly back and forth multiple times in a season) - straight line distance
- 4512 (female): traveled a 70km circle from Todd Well lekking area to Cougar Well Wilderness Study Area to Gerry Mountain Wilderness Study Area back down past Smokey Butte and ending at Todd Well lekking area again (happened in for one week in April 2023) - measured in steps, not straight line
- 5150 (female): trapped in Brothers (Todd Well lek area) and traveled 45km one direction to 12-mile Table/Rickman Springs - measured as steps, not straight line
- 4263 (male): traveled 27km from Todd Well lekking area to Cougar Well Wilderness Study Area in Paulina in 2023 (back at Todd Well lekking area now) - straight line distance
- 5191 (female): traveled 23km from Circle F lekking area to Bear Creek Butte for nesting in 2022 - straight line distance
- 5126 (female): traveled 45km from Rickman Springs to Glass Butte in winter 2022-2023 - straight line distance

South of Highway 20

- 5196 (female): traveled 35km from brooding area (Antelope Butte) to Fort Rock/Christmas Valley in 2022 and 2023 - straight line distance
- 5198 (female): traveled 18km from Scabrock lekking area to East Lava Bed Wilderness Study Area in summer 2022 and 2023 - straight line distance
 - 5198 (female): disappeared from GPS data downloads from August 2022 (East Lava Bed Wilderness Study Area) and popped up in Millican area in February 2023 (50km) - straight line distance
-
- 5199 (female): traveled 35km from Scabrock lekking area to Fort Rock/Christmas Valley in 2022 and 2023 (all locations in the southeastern portion of low density habitat (yellow) in Brothers) - straight line distance
- 4259 (male): traveled 20km from Scabrock lekking area to East Lava Bed Wilderness Study Area in summer in 2022 and 2023 - straight line distance
- 4204 (male): traveled 70km one direction (Benjamin Lake lek area to meadows south of Riley) - measured as steps, not straight line

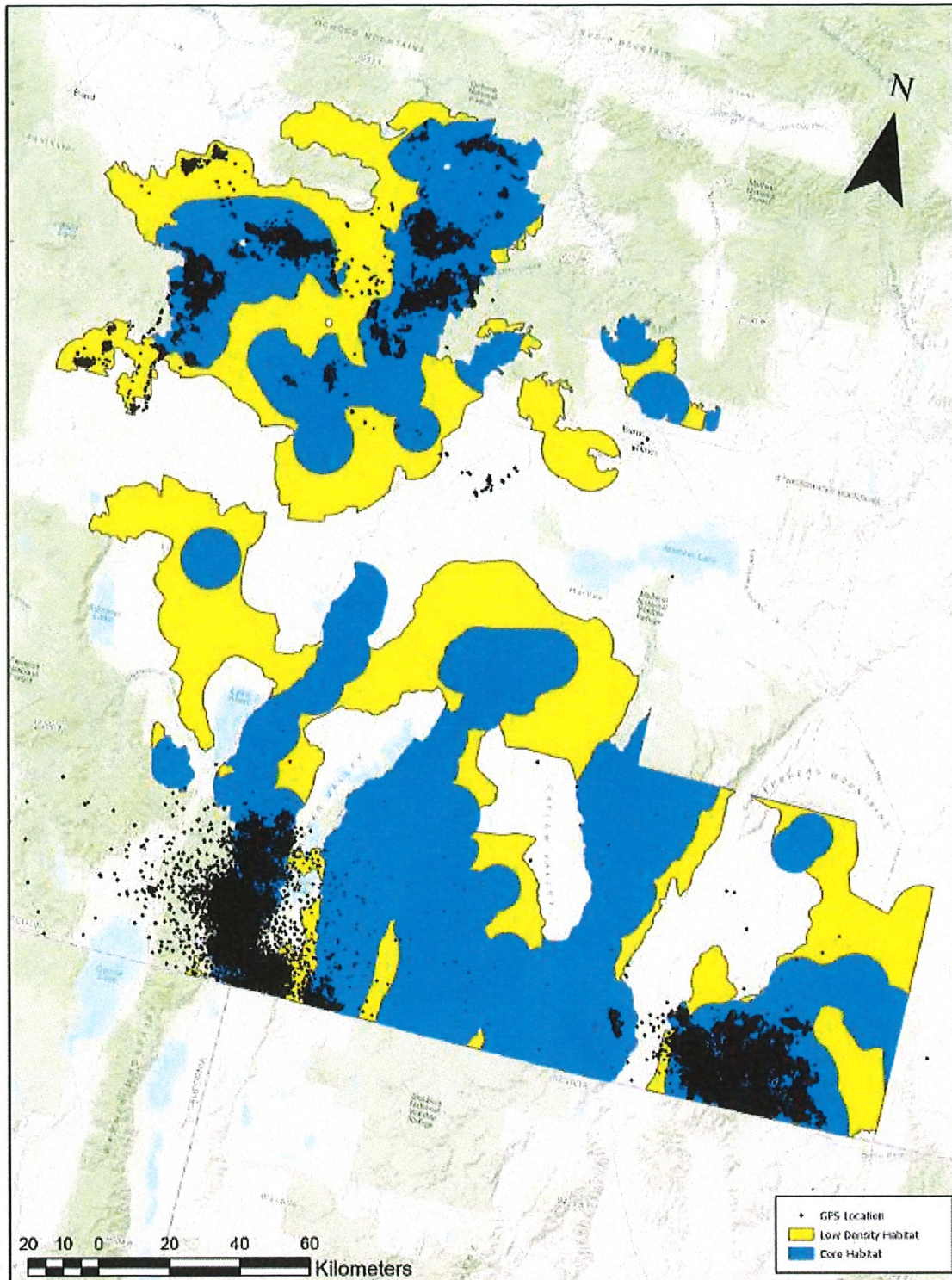


Figure 1. Map depicting Oregon Department of Fish and Wildlife Core (blue) and Low Density (yellow) Areas in relation to 713,000 locations (black dots) of radio-marked greater sage-grouse. Note at the time of this plot, some quality assessment had not been conducted on the southwestern edge of the map. Regardless of that noise, locations in this region were still 98% contained within Core designation.

Table 1. Total number of female (F) and male (M) greater sage-grouse radiotelemetry locations ($n = 713,507$) from southeastern Oregon collected from 2009-2023. Data was collected from both standard VHF and GPS-Satellite transmitters fitted to sage-grouse.

Study Area/Season	Core Area			Low Density			Outside		
	F	M	Prop	F	M	Prop	F	M	Prop
Brothers-Paulina									
Spring	19,745	2,895	0.93	876	865	0.07	1	-	0.00
Summer	17,587	7,126	0.92	1,939	25	0.07	19	285	0.01
Fall	8,418	3,539	0.89	1,320	1	0.10	15	160	0.01
Winter	5,983	1,740	1.00	2	-	0.00	-	-	0.00
Subtotal	51,733	15,300	0.92	4,137	891	0.07	35	445	0.01
Warners									
Spring	137,440	.	1.00	280	.	0.00	343	.	0.00
Summer	92,208	.	0.99	180	.	0.00	733	.	0.01
Fall	62,582	.	0.97	127	.	0.00	1,725	.	0.03
Winter	81,631	.	1.00	107	.	0.00	124	.	0.00
Subtotal	373,861	.	0.99	694	.	0.00	2,925	.	0.01
Trout Creeks									
Spring	84,259	.	0.99	14	.	0.00	85	.	0.00
Summer	84,112	.	0.99	1	.	0.00	324	.	0.00
Fall	55,502	.	0.99	41	.	0.00	174	.	0.00
Winter	39,770	.	0.99	53	.	0.00	16	.	0.00
Subtotal	263,643	.	0.99	109	.	0.00	599	.	0.00
Overall									
Spring	241,444	2,895	0.99	1,170	865	0.01	429	-	0.00
Summer	193,907	7,126	0.98	2,120	25	0.01	1,076	285	0.01
Fall	126,502	3,539	0.97	1,488	1	0.01	1,914	160	0.02
Winter	127,384	1,740	1.00	162	-	0.00	140	-	0.00
Subtotal	689,237	15,300	0.99	4,940	891	0.01	3,559	445	0.01

From: Wufoo <no-reply@wufoo.com>
Sent: Friday, November 17, 2023 12:23 PM
To: SageGrouse Plan * ODFW <SageGrouse.Plan@odfw.oregon.gov>
Subject: Sage-grouse Plan Revision [#9]

Are you Yes
an
Oregon
resident?
(Optional)

Email jonathan.d.muir@odfw.oregon.gov

- I understand that I am agreeing to receive email messages about the Oregon Sage-Grouse Plan Revision at the email address listed above.

COMMENT BOX

Pertaining to the Robinson Ranch at Big Valley near Adel Oregon: Landowner and ODFW request inclusion of Big Valley within the low density sage grouse conservation area for the following reasons:

1) Mr. Robinson, who has lived at Big Valley for more than 70 years, used to observe sage grouse broods regularly during summer months in the wet meadows associated with Big Valley as well as on surrounding BLM lands to the east. As time passed, those populations dwindled to the point of local extirpation. Upon completion of BLM juniper treatments on neighboring BLM lands, Mr. Robinson once again started observing sage grouse brood rearing behavior within Big Valley and surrounding BLM lands to the east. 2) ODFW data indicates use of Big Valley by radio marked sage grouse during the summer brood rearing months. 3) High elevation, wet meadow habitats are known to be a limited and key feature of this landscape. Providing limited protections for sage grouse in this location will help ensure persistence of neighboring leks and aids in achieving the State's goal of "protecting the core"

Attach a
File



[big_valley.jpg](#) 731.85 KB · JPG

▪

