SAGE GROUSE
MONTANA LOCAL WORKING GROUPS

February 14, 2008

LaVerne Kyriss, DOE and Kathryn Winthrop, BLM
c/o Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

RE: Comments on West-wide Energy Corridor Programmatic Environmental Impact Statement

Dear Ms. Kyriss and Ms. Winthrop:

The Local Working Group (LWG) for Sage-grouse Conservation for southwest Montana was briefed at our recent meeting in Dillon about various proposals to route large 500 kilovolt (kV) utility lines through southwest Montana, and we have also reviewed some aspects of the West-wide Energy Corridor Programmatic Environmental Impact Statement designation process currently underway.

The LWG is an official group of agencies (BLM, MDFWP, NRCS, USFS, DNRC) and stakeholders (landowners, hunters, conservationists) authorized under Montana's 2004 Sage-grouse Management Plan for implementing conservation measures in this region. We are working in an area where current sage-grouse populations are significantly lower than those observed 25-30 years ago. It will take concerted effective action to prevent further declines and potential addition of the species to the federal Endangered Species list.

Based on initial surveys and what is known from California and Nevada where the impacts of utility lines on sage-grouse have already been assessed, we have strong concerns about some of the potential proposed routing of lines (Atamian et al. 2006; Bi-State Plan 2004; Ellis 1984; Hall and Haney 1997; Lammers and Collopy 2005; Sierra Pacific Power 2003). For example, in northern California overhead power lines have had a negative effect on lek attendance and strutting activity has ceased on all leks within one mile of a power line, while other lines also are believed to be impacting populations (Bi-State Plan 2004).

Several mechanisms converge to affect sage-grouse when tall structures are erected in their habitats. Sage-grouse may:

- during periods of low visibility (dusk/dawn, fog, smoke, rain, etc.) collide in flight with both the wires and towers, causing direct injury and mortalities;
- face elevated levels of predation and harassment from raptors, which more effectively hunt from the elevated perches provided by the utility line structures;

- as a result of predator pressure, or instinctively be displaced from the habitat around the utility lines over large areas, reducing habitat value for lekking, nesting, brood rearing, and wintering;

In addition, sage-grouse habitat may/will be:

- effectively "partitioned" and fragmented when grouse are unwilling to fly past, walk under, or in other ways use habitat adjoining utility lines, towers, pipelines, and new roads;
- reduced by the direct footprint of the towers and associated roads.

Because much of the non-forested portions of Beaverhead and Madison counties are occupied sage-grouse habitat, the best-case scenario for habitat integrity and population maintenance would be complete suspension of plans to site new utility corridor projects here. However, lacking this, then avoidance of sage-grouse lek sites, nesting habitat, winter habitat, and migratory corridors is most likely the best approach to avoiding impact to the region's grouse population.

To maximize the avoidance of crucial sage-grouse habitat in southwest Montana, designation of any new utility corridor must occur through constraining siting to the Interstate 15 corridor. As such, we strongly recommend that the utility corridor not be designated along route 50-260 as depicted in the Montana State Base Map Series.

The I-15 corridor is already heavily impacted by other infrastructure, subdivision, and native rangelands have been converted to active agriculture. As such, it has much lower value to sage-grouse and other sensitive shrub-steppe species. Generally, the I-15 corridor has little documented current use by sage-grouse, with the exception of the area around Monida Pass where terrain may funnel migrating grouse towards the interstate. The same phenomenon has been observed in adjoining passes like Bannack Pass on the south rim of Big Sheep Basin and the Snowline area. It will be appropriate to seek special, and likely very costly, mitigation for line routes which do not avoid crucial wildlife areas.

We appreciate the opportunity to comment on the West-wide Energy Corridor PEIS. Please add us as representatives of the Southwest Montana Local Working Group as interested stakeholders to your mailing list for announcements and public review of any documents related to this project.

Sincerely,

Ben Deeble, Sage-Grouse LWG co-chair
240 N. Higgins Ave. #2
Missoula, MT 59802
deeble@nwf.org

References

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