

**UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
COLORADO STATE OFFICE  
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June 29, 2022

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Instruction Memorandum No. CO-2022-028  
Expires: 09/30/2025

To: Field Managers, BLM Colorado

From: Stephanie Connolly  
Acting State Director

Subject: Gunnison Sage-Grouse Habitat Management Policy on Bureau of Land  
Management-Administered Lands in Colorado

**Program Area:** All Programs

**Purpose:** The intent of this Instruction Memorandum (IM) is to provide interim guidance for Gunnison Sage-Grouse (GUSG), a species listed as threatened by the U.S. Fish and Wildlife Service (FWS). The Bureau of Land Management (BLM) manages approximately 42 percent of GUSG occupied habitat, with the majority located across southwest Colorado (FWS 2020). The guidance outlined in this IM will apply to all mapped habitat, including all critical habitat (occupied and unoccupied), as designated by the FWS, in addition to the occupied, potential, and vacant/unknown habitat categories mapped by Colorado Parks and Wildlife (CPW), across the GUSG range in Colorado (Attachment 1). The BLM will continue to apply conservation and mitigation measures to manage and conserve GUSG and their habitat in addition to considering the FWS Final Recovery Plan and Recovery Implementation Strategy for GUSG (FWS 2020). The BLM is committed to continued coordination with FWS, state agencies, counties, permittees, and private landowners to ensure conservation of GUSG habitat.

The objective of this IM is to maintain and enhance populations and distribution of GUSG by protecting and improving sagebrush habitats and ecosystems.

The guidance outlined in this IM:

- Recognizes the FWS Final Rule for Designation of Critical Habitat for GUSG (79 FR 224) under the Endangered Species Act (ESA) (November 20, 2014) posted [here](#).

- Does not absolve the BLM from meeting its responsibilities under Section 7(a)2 of the Endangered Species Act (ESA).
- Provides updated direction and consistency regarding management and ongoing planning actions in all GUSG habitats.
- Does not preclude developing or using additional conservation measures or strategies, above and beyond what is outlined in this IM, deemed necessary to maintain or enhance local GUSG habitat and populations.
- Recognizes that the BLM proposes to incorporate management decisions, objectives, and conservation measures for the protection of GUSG and its habitat into relevant Resource Management Plans (RMP) through a GUSG rangewide plan amendment process.
- Ensures continued coordination with the FWS, State fish and wildlife agencies, and other partners regarding implementation, updates, and project prioritization for GUSG conservation and strategies identified in the [Final Recovery Plan for Gunnison Sage-Grouse](#), [Recovery Implementation Strategy for Gunnison Sage-Grouse](#), and [Rangewide Gunnison Sage-Grouse Conservation Plan](#) (RCP) (FWS 2020, FWS 2020, and Gunnison Sage-Grouse Rangewide Steering Committee 2005).

**Administrative or Mission Related:** Mission

**Policy/Action:** The BLM will continue to apply conservation measures to manage and conserve GUSG and its habitat and implement the FWS recommendations for minimizing or avoiding adverse effects to GUSG or its habitat. The BLM’s objective is to maintain and enhance populations and distribution of GUSG by protecting and improving sagebrush habitats and ecosystems that sustain GUSG populations. The BLM will evaluate and consider guidance provided in the FWS 2019 [Species Status Assessment](#), [Final Recovery Plan](#), and [Recovery Implementation Strategy](#) for GUSG when analyzing or implementing proposed actions. The BLM management actions and conservation measures in this IM apply to all habitat as defined in the FWS Final Recovery Plan (FWS 2020). Exceptions, waivers, and modifications to the conservation measures outlined in this IM can be made through coordination with the Colorado State Office Sage-Grouse Coordinator and through the consultation process with FWS. The BLM will continue to work with the FWS and State fish and wildlife agencies to identify the best available science for implementation of this IM and necessary conservation measures.

**GUNNISON SAGE-GROUSE HABITAT OBJECTIVES**

1. Habitat objectives for GUSG, based on the best available science, are included in Attachment 2. It is the policy of the BLM to manage public lands with GUSG habitat to meet or exceed these objectives when ecological site potential exists.
2. Habitat objectives (Attachment 2) for GUSG will be examined with data collected through the [Assessment, Inventory, and Monitoring](#) (AIM) protocol and evaluated using the site-scale analysis outlined in the [Habitat Assessment Framework](#) (HAF) technical reference. The

results from the site-scale habitat assessment will be used when completing the wildlife/special status species portion of a land health standard evaluation in all GUSG habitat (see [IM 2018-21](#) and subsequent IM).

3. HAF reports will be completed and incorporated into National Environmental Policy Act (NEPA) analysis for proposed surface disturbing activities, grazing permit renewals, or other applicable proposed actions where additional information is needed to inform the decisionmaker on GUSG habitat suitability. Field offices should strive to have HAF reports completed within one year of issuance of this IM in coordination with the Colorado State Office. See [IM 2018-21](#) and subsequent IM for additional guidance.

## **DISTURBANCE AND SEASONAL TIMING LIMITATIONS**

The BLM will avoid surface disturbing activities and developments within habitat, unless a benefit to GUSG or their habitat can be shown (e.g., vegetation treatments to improve sagebrush habitat). Surface disturbance should first be focused outside of habitat areas, then in non-habitat areas, except where valid existing rights occur and habitat cannot be avoided, and except where benefits to GUSG are greater compared to other available alternatives. Surface disturbance, surface disturbing activities, surface use, and other terminology incorporated into this IM are as defined by the Northwest Colorado Greater Sage-Grouse Approved Resource Management Plan Amendment (GRSG ARMPA, see Chapter 5 Glossary) (BLM 2015).

Surface disturbing and disruptive activities, including vegetation treatments, in or near GUSG habitat should be managed to avoid, minimize, and compensate for: (1) disturbance, displacement, or mortality of GUSG, (2) loss of habitat or effective habitat loss through fragmentation, and (3) landscape-level impacts.

1. No surface disturbing or disruptive activities within GUSG habitat during lekking, nesting, and early brood-rearing (**March 1 to July 15**). Livestock grazing is not considered a surface disturbing or disruptive activity (see Chapter 5 of GRSG ARMPA). Some examples of surface disturbing and disruptive activities may include vegetation removal, digging, dredging, blading, mowing, drilling, construction, heavy equipment use, etc.
2. Avoid or minimize surface disturbance, disruptive activities, surface occupancy (e.g., well pads, solar developments, wind turbines, radio towers, etc.), and placement of tall structures in habitat within 2 miles of all leks (active, inactive, unknown, and historic).
3. Avoid construction of new roads or rights-of-ways (ROWs) in habitat within 4 miles of all leks (active, inactive, unknown, and historic), unless a benefit to GUSG or their habitat can be shown (e.g., realignment of roads to avoid or restore wet meadow habitat or avoid lekking areas). Construction of new routes and ROWs may be considered if no net gain in miles of road can be offset/compensated with road decommissioning within GUSG habitat areas.
4. Avoid routing above-ground transmission or distribution lines within habitat.
5. Incorporate reclamation standards designed to re-establish suitable GUSG seasonal habitats (see Attachment 2: Seasonal Habitat Objectives for GUSG) for all surface disturbing

activities within habitat, where ecological site potential exists. Incorporate ecologically appropriate native, weed-free, seed mixtures in restoration efforts. Where appropriate, seed mixtures should include native grasses, native forbs, and native sagebrush species. Use of desired non-native vegetation in rehabilitation should be avoided and only implemented where other options have been proven unsuccessful.

6. Monitor all restoration activities for success in meeting short- and long-term vegetation objectives and reclamation standards, including potential weed infestations, following the principles outlined in the BLM Assessment, Inventory, and Monitoring strategy. Conduct follow-up treatments to eliminate weeds as identified through monitoring. If vegetation objectives are not being met, adjust restoration actions accordingly to improve the success of achieving desired GUSG habitat objectives.
7. Include requirements to new Special Recreation Permits (SRP) to avoid disturbing lekking and nesting activities during the breeding season. (**March 1 – July 15**).
8. Evaluate the need, and implement where appropriate, seasonal or permanent road or trail closures in habitat through travel management planning and associated NEPA analysis for BLM authorized routes.

## **BUFFERS**

The BLM will apply the lek buffer distances identified below to all leks (active, inactive, unknown, and historic), as required conservation measures, such as Conditions of Approval (COA), to fully address the impacts on leks as identified in the NEPA analysis, unless justifiable departures are determined to be appropriate (BLM 2015 and Gunnison Sage-Grouse Steering Committee 2005). Impacts should first be avoided by locating the action outside of the applicable lek buffer distance(s) identified below:

- Linear features (roads) within 4 miles of leks.
- Infrastructure related to energy development (e.g., solar developments, wind turbines, oil and gas wells) within 4 miles of leks.
- Tall structures (e.g., communication or transmission towers and transmission lines) within 4 miles of leks.
- Low structures (e.g., fences, rangeland structures, solar developments) within 1.2 miles of leks.
- Surface disturbance (continuing human activities that alter or remove the natural vegetation) within 4 miles of leks.
- Limit noise and related disruptive activities, including those that do not result in habitat loss (e.g., motorized recreational events), to not exceed 49 decibels (dB) as measured 30 feet from the source or at least 0.25-mile from leks, whichever is greater.

Justifiable departures to decrease or increase from these distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations and state regulations) may be appropriate for determining activity impacts. The BLM may approve actions in habitat that are within the applicable lek buffer distance identified above only if:

“The BLM, with input from the State fish and wildlife agency and the FWS, determines, based on best available science, landscape features, and other existing protections, that a buffer distance other than the distance identified above offers the same or greater level of protection to GUSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area.”

## **MITIGATION**

In all GUSG habitat, in undertaking BLM management actions, and consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and ensure compensatory mitigation for the species that accounts for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions (see [IM 2021-049](#) BLM’s Mitigation Manual Section MS-1794 and the Mitigation Handbook H-1794-1).

## **LIVESTOCK GRAZING MANAGEMENT**

The overarching objective for livestock grazing management, is to manage or adjust permitted livestock grazing to maintain and/or enhance GUSG habitat to meet GUSG seasonal habitat objectives and the [BLM Colorado Grazing Standards and Guidelines](#) (Standards for Public Land Health and Guidelines for Livestock Grazing Management), based on ecological site potential. GUSG habitat objectives and well-managed livestock operations are compatible because forage availability for livestock and hiding cover for GUSG are both dependent on healthy plant communities. The objective is to promote sustainable GUSG populations concurrent with sustainable ranch operations to offer long-term stability. In the context of sustainable range operations, manage the range program to: (1) maintain or enhance vigorous and productive plant communities; (2) maintain residual herbaceous cover to reduce predation during GUSG nesting and early brood-rearing; (3) avoid direct adverse impacts to GUSG-associated livestock infrastructure; and (4) employ grazing management strategies that avoid concentrating animals on key GUSG habitats during key seasons.

1. *Within 30 days of issuance of this IM:* Field Offices (FOs) will validate and complete the [GUSG Allotment Data Summary](#) sheet for all allotments containing GUSG habitat with permits administered by their Field Office. Field Offices will correct any misidentified data and append additional data (ex: missing allotments, additional notes, etc.).
2. *Within 60 days of issuance of this IM:* Field Offices will evaluate and provide a schedule for permit renewals with GUSG habitat areas based on the [GUSG Allotment Data Summary](#) and

consideration of the following prioritization factors (see [IM 2018-024](#) for additional guidance):

- Allotments where ESA Section 7 consultation for GUSG has not been completed should be considered higher priority.
  - Allotments with active GUSG leks present, regardless of landownership.
  - Allotments where GUSG habitat objectives (i.e., HAF) are not meeting/suitable and causal factors are unrelated to ecological site potential.
  - Allotments where Land Health Standards (LHS) have never been evaluated and formally documented in an evaluation report.
  - Allotments where LHS are not meeting for one or more standards in GUSG habitat.
  - Allotments with occupied habitat areas are higher priority than unoccupied, potential, or vacant/unknown habitat areas and where allotments are wholly or partially within these habitat types.
  - Allotments where preliminary information indicates resource damage (e.g., riparian or wet meadows) may be occurring or GUSG habitat objectives may not be suitable, but factors have not yet been formally evaluated.
3. When processing a grazing permit renewal (43 CFR, Part 4130) adaptive management practices will be evaluated, analyzed, and addressed through the NEPA and consultation process, where appropriate. In addition, if livestock management practices are determined to be a causal factor for not meeting or making progress toward meeting GUSG habitat objectives (wildlife/sensitive species LHS) then changes to grazing management practices will be incorporated into grazing authorization modifications or allotment management plans through consultation, coordination, and cooperation (per 43 CFR 4180). Potential modifications include, but are not limited to, changes in:
- Season or timing of use (including rotation).
  - Numbers of livestock (include temporary non-use or livestock removal).
  - Distributions of livestock use.
  - Grazing schedules (including rest or deferment).
  - Duration and/or level of use (e.g., utilization, stubble height, height-weight measurement curves, etc.).
4. Schedule the time and location of livestock turnout and trailing to minimize livestock concentrations in lek areas during the lekking season (**late March through May**) (Gunnison Sage-Grouse Rangewide Steering Committee 2005).

5. Place mineral or salt supplements, new handling facilities (e.g., corrals and chutes), and temporary or mobile water away from riparian areas, springs, meadows, and leks. Place them in locations that enhance livestock distribution.
6. To reduce disturbance to GUSG during the lekking and nesting season, do not allow sheep bedding areas and herder camps near active leks from March 1 to June 30.
7. Within habitat, incorporate GUSG habitat objectives and management considerations into all BLM grazing management plans through either Allotment Management Plans, Permit Terms and Conditions, Outcome Based Grazing, or Adaptive Management Plans.
8. Within habitat, complete land health assessments (LHA) to identify whether GUSG habitat objectives are being met.
9. Within habitat, when livestock management practices are determined to not be compatible with or making progress toward achieving habitat objectives (Attachment 2), following appropriate consultation, cooperation and coordination, implement changes in grazing management through grazing authorization modifications, or allotment management plan implementation. Potential modifications may include, but are not limited to, changes in the following:
  - Season or timing of use
  - Numbers of livestock
  - Distribution of livestock use
  - Duration and/or level of use grazing schedules (including rest or deferment).
10. Within habitat, develop specific objectives—through NEPA analysis (i.e., Environmental Assessment or Environmental Impact Statement) conducted in accordance with the permit/lease renewal process—to conserve, enhance, or restore GUSG habitat (see Attachment 2 and 3). Base benchmarks on ecological site/range site descriptions. Where ecological site/range site descriptions have not been developed, or are too general to serve adequately as benchmarks, identify and document local reference sites for areas of similar potential that exemplify achievement of GUSG habitat objectives and use these sites as the benchmark reference. Establish measurable objectives related to GUSG habitat from baseline monitoring data, ecological site descriptions (ESDs), or LHAs/evaluations, or other habitat and successional stage objectives.
11. The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within habitat would include specific management thresholds based on GUSG habitat objectives (Attachment 2), Land Health Standards (43 CFR, Part 4180.2), ecological site potential, and one or more defined responses that would allow the authorizing officer to adjust livestock grazing management that has previously been subject to NEPA analysis. See Attachment 3 of this IM for select examples.
12. Allotments with GUSG habitat containing riparian areas, including wet meadows, should be prioritized for field checks to help ensure compliance with the terms and conditions of the

grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.

13. Establish permit/lease terms and conditions in conjunction with grazing strategies to ensure the timing and level of utilization results in wet meadows with diverse species richness, including a component of perennial forbs, relative to site potential (i.e., reference state).

## **RANGELAND MONITORING**

All permit renewals within GUSG habitat will include an allotment monitoring plan, which incorporates GUSG habitat objectives (Attachment 2), where ecological site potential exists.

- Monitoring plans for livestock grazing should be developed for every allotment and/or term permit renewal. Monitoring plans will incorporate GUSG habitat objectives and consider the LHA determination, ecological site potential, livestock use patterns, and other factors to assess whether the grazing management system is achieving the desired objectives over the term of the permit. The monitoring plan will outline specific key questions to be answered and how the data will be collected to answer these questions. This will allow specialists to consider site-specific resources, impacts, vegetation characteristics, livestock use patterns, and other factors that could vary rangewide to avoid taking a ‘one-size-fits-all’ approach. One of many examples of a monitoring and grazing management plan can be found in Attachment 4 of this IM.

Field office specialists may incorporate the use of cooperative monitoring with permittees, AIM, utilization, photo points, and other appropriate rangeland trend or monitoring techniques into the allotment permit renewal monitoring plan.

The following documents may be helpful in developing an allotment monitoring plan (not a comprehensive list):

- [BLM Technical Reference 1734-8 Monitoring Manual for Grassland, Shrubland and Savanna Ecosystems](#)
- [BLM Technical Reference 1734-4 Sampling Vegetation Attributes](#)
- [BLM Technical Reference 1734-3 Utilization Studies and Residual Measurements](#)
- [BLM Technical Note 455 Applying and Interpreting Assessment, Inventory, and Monitoring \(AIM\) Data at the Field Office Level: An Example](#)
- [BLM Technical Note 453 Guide to Using AIM and LMF Data in Land Health Evaluations and Authorizations of Permitted Uses](#)

## **RECREATION**

The FWS and BLM notes that recreational activities, a significant use on federal lands, can result in direct and indirect effects on sage-grouse and habitat. Citing the RCP (2005), the FWS notes that direct disturbance during critical biological periods, including lekking, nesting, and early brood-rearing, “can result in abandonment of lekking activities and nest sites, energy expenditure reducing survival, and greater exposure to predators” (75 FR 187, 59846). As such:



1. Manage recreation to avoid activities that (1) disrupt GUSG seasonal use periods (see Attachment 2), (2) fragment GUSG habitat, or (3) spread noxious weeds.
2. Do not allow special recreation permits with the potential to adversely affect GUSG or GUSG habitat.
3. Develop trail mapping and educational campaigns to reduce recreational impacts on GUSG and their habitat.

## **SAGEBRUSH MANIPULATION AND RESTORATION PROJECTS**

All GUSG habitat improvement projects and vegetation manipulation within habitat, should clearly articulate and document the need for the project to achieve desired habitat objectives (Gunnison Sage-Grouse Rangewide Steering Committee 2005, Appendix H). Documentation for vegetation management will require a HAF report and site-specific vegetation monitoring data to evaluate treatment objectives as they relate to GUSG habitat. Sagebrush manipulation and removal should be limited to areas of high sagebrush mortality (i.e., > 75% mortality) in habitat and carefully consider the timing of treatments during drought conditions.

All vegetation treatments in sagebrush habitat should consider and incorporate seasonal GUSG habitat needs into project design, analysis, and approval. Project implementation should include the recommendations for sagebrush removal or treatment projects within seasonal habitats in the RCP, Appendix I (pg. 6 and 7).

All habitat treatments and vegetation management prescriptions in GUSG habitat should incorporate appropriate effectiveness monitoring to determine whether one or more of the following goals are being achieved:

1. Meeting site-specific GUSG habitat objectives consistent with best available science as shown in Attachment 2.
2. Enhancing the long-term sustainability of local GUSG populations.
3. Promoting the maintenance of large intact sagebrush communities.
4. Limiting the expansion and dominance of invasive species.
5. Maintaining or improving soil site stability, hydrologic function, and biological integrity.
6. Enhancing the native plant community, including the native shrub reference state in the State and Transition Model, with appropriate shrub, grass, and forb composition identified in the applicable ESD where available.
7. Meeting specific project or management objectives as they relate to GUSG or their habitat.

Livestock grazing will be deferred for all GUSG habitat improvement or restoration treatments that include a seeding component for a minimum of two growing seasons to ensure establishment

and persistence of desired vegetation, unless monitoring, analysis, and management objectives recommend otherwise.

The BLM will prioritize all GUSG restoration efforts in unoccupied and occupied habitat in conjunction with the FWS and State fish and wildlife agencies. Once completed, HAF reports will be used to help prioritize restoration and treatment areas. Priorities will reflect ground-truthing of ecological site potential, likelihood of success, planning and design, monitoring needs, and prioritization by population trends.

## **FLUID MINERALS**

At a minimum, field offices will analyze and implement conservation measures that prohibit or limit energy and discretionary mineral development within habitat and avoid, minimize, and mitigate surface disturbance and disruptive activities in habitat.

### Newly Nominated Leases

Since the RCP (2005) was signed, the BLM Colorado's policy has been to defer leasing of GUSG habitat until new field office land use planning has been completed for habitat areas, as these documents detail significant new information on GUSG not addressed in RMPs pre-2005. In accordance with [IM 2021-027](#), "the BLM will not routinely defer leasing when waiting for an RMP amendment or revision to be signed. Rather, when making leasing decisions, the BLM will exercise its discretion consistent with existing RMPs and the State Director should consult with the Headquarters Office (HQ-100) before deciding to defer leasing of any parcels."

### Existing Leases

For authorization of any development actions (for individual Application for Permit to Drill (APDs) or where an operator proposes a Master Development Plan) where there are valid existing rights, field offices must consult with the FWS (consistent with requirements under ESA), CPW, Utah Division of Wildlife Resources, and industry on management actions designed to avoid, minimize, and mitigate impacts to GUSG or their habitat, including COAs that will be applied to future APDs. The BLM must ensure that any proposed COAs or mitigation measures are consistent with the RMP, are adequately supported by site-specific NEPA analysis and do not violate any lease rights (see Yates Petroleum Corp., 176 IBLA 144 [2008]).

In accordance with standard lease terms and conditions, existing leases are subject to applicable laws, including ESA, and therefore, may be required to adopt conditions of approval that would reduce adverse impacts to the species consistent with site-specific environmental analysis and ESA consultation.

BLM offices are encouraged to work with the FWS, State fish and wildlife agencies, and industry in advance of planning to develop potential strategies in a particular geographic area. This pre-planning may include conservation strategies such as siting a project in lower quality habitat, clustering activities to minimize fragmentation of existing habitat patches, or noise mitigation.

This policy does not preclude developing and immediately implementing new mitigation or conservation measures necessary to reduce activity/project impacts to GUSG or their habitats, provided this mitigation is in accordance with existing RMPs and lease rights granted. Any new measures applied for GUSG will be coordinated with the FWS and State fish and wildlife agencies. Field offices will work with project proponents, the State, the FWS, and private landowners when appropriate to implement direct avoidance and minimization measures (e.g., relocating disturbance, timing restrictions, etc.) and use COAs. Field offices must ensure any recommended COAs or operator-negotiated stipulations are supported by appropriate analysis through NEPA during the APD, plan of development, or use-authorization approval process.

Biologists are encouraged to reference existing analyses or accepted recommendations from national, rangewide, or local conservation plans; existing or new peer reviewed research studies; or other scientific reports within the NEPA analysis, rather than restate those analyses.

### **ADAPTIVE MANAGEMENT**

For purposes of this IM, adaptive management is used to address two main factors:

1. Incorporating applicable new research or guidance into GUSG management.
2. Adjusting management to achieve specific GUSG resource objectives as determined through monitoring.

As new research, monitoring data, national or state management guidance, population trends, habitat data, or other pertinent GUSG information becomes available, recommended management of GUSG should be adjusted accordingly. All recommended management applications will continue to be considered through NEPA analysis and FWS consultation. The success in implementation and effectiveness of this management direction will be reviewed to determine if GUSG resource objectives are being met. This review will be in coordination with the FWS, State fish and wildlife agencies, and other agencies as appropriate.

### **CONSULTATION WITH FWS**

The ESA requires the BLM to consult on all management actions that may result in a Jeopardy determination of a proposed species. Since the BLM is generally not in a position to determine Jeopardy, the BLM policy (Manual Section 6840) is to consult on all discretionary actions that May Affect or are Likely to Adversely Affect.

The procedures for carrying out Section 7(a)(2) are included in 50 CFR Part 402, Interagency Cooperation and the counterpart regulations developed for National Fire Plan projects (50 CFR Part 402.30-34). Whenever the BLM is considering a discretionary action that may affect a listed or proposed species or their habitat, the BLM should consider engaging the FWS early in the project development process and seek recommendations designed to minimize or avoid potential adverse effects to resources protected under the ESA.

**Timeframe:** This IM is effective immediately and will expire upon completion of the Record of Decision (ROD) for the GUSG RMP amendment.

**Budget Impact:** This IM will result in additional operational costs for coordination, NEPA review, monitoring, and consultation with FWS on all activities in GUSG habitats in Colorado. In addition, full implementation of this IM, including initiating a GUSG rangewide plan amendment, restoration efforts, response to climate change indicators, and adaptive management may require significant funding.

**Background:** Gunnison Sage-Grouse (*Centrocercus minimus*; GUSG) is a bird in the grouse family that lives exclusively in the sagebrush steppe ecosystems of southwestern Colorado and southeastern Utah. On November 20, 2014, the FWS listed GUSG as a threatened species (79 FR 69191) and designated critical habitat for the species (79 FR 69311) under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq; hereafter ESA). GUSG are closely associated with sagebrush (*Artemisia* spp.) ecosystems in North America (Young et al. 2015, p. 1).

Currently, GUSG are found in eight, small populations distributed across southwestern Colorado and southeastern Utah, with seven populations located in Colorado (Gunnison Basin, Poncha Pass, Crawford, Cerro Summit-Cimarron-Sims Mesa (CSCSM), Piñon Mesa, San Miguel Basin, Dove Creek) and one population in Utah (Monticello) (see 2019 FWS Final Recovery Plan, Figure 1). The Gunnison Basin population is the largest population of the eight and has the most occupied habitat, covering approximately 239,641 hectares (592,168 acres). The Gunnison Basin population supports approximately 85 percent of breeding GUSG and 65 percent of the occupied habitat. The remaining 15 percent of the individuals are distributed among the remaining seven populations, which comprise approximately 35 percent of the overall occupied habitat (2019 FWS). Threats to the species vary by population in both Colorado and Utah and are articulated in their respective Conservation Plans or the FWS Final Recovery Plan and Recovery Implementation Strategy.

As a land manager of GUSG habitat, it is imperative that the BLM conserve sagebrush communities to support sustainable GUSG populations and maintain or improve connectivity of habitat within and between existing populations. However, successful management of GUSG will require cooperation from private, state, and federal landowners and managers to address the wide range of land uses that intersect with GUSG habitat. For instance, while the BLM is a primary land manager of GUSG habitat in Colorado, between 80-90 percent of all oil and gas drilling activity statewide occurs on private, county, or state lands, with no federal nexus. Only by finding ways to work across landscapes that transcend ownership boundaries will federal, state, and private landowners and managers achieve substantial and measurable conservation gains for sagebrush communities and sustainable GUSG populations.

**Manual/Handbook Sections Affected:** None

**Coordination:** This IM was coordinated with the BLM Utah State Office, BLM Colorado State Office, Colorado Parks and Wildlife, and the U.S. Fish and Wildlife Service.

**Contact:** If there are questions regarding this IM, please contact Leah Waldner, BLM Colorado Sage-Grouse Coordinator at [lwaldner@blm.gov](mailto:lwaldner@blm.gov) or (970) 244-3045.

Signed by:  
Stephanie Connolly  
Acting State Director

Certified By:  
Brian Klein  
Supervisory Records Administrator

4 Attachments:

1. [Gunnison Sage-Grouse Habitat Map](#) (1p)
2. [Seasonal Habitat Objectives for Gunnison Sage-Grouse](#) (2pp)
3. [Thresholds and Responses Examples](#) (5pp)
4. [Monitoring and Adaptive Management Examples](#) (4pp)