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**UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF HEARINGS AND APPEALS
BOARD OF LAND APPEALS**

WESTERN WATERSHEDS PROJECT,
CENTER FOR BIOLOGICAL
DIVERSITY, and AMERICAN BIRD
CONSERVANCY,

Appellants,

v.

BUREAU OF LAND MANAGEMENT,

Respondent.

IBLA No. _____

Appeal of the Decision Record, Finding of
No Significant Impact, Environmental
Assessment DOI-BLM-UT-W020-2017-
0001-EA for the September 2017
Competitive Oil and Gas Lease Sale

DECLARATION OF STEVE HOLMER

I, Steve Holmer, declare as follows:

1. My name is Steve Holmer. I am personally aware of the matters set forth below, and if called as a witness I would and could truthfully testify thereto.

2. I am the Vice President of Policy for the American Bird Conservancy (“ABC”). I have served in this role since 2016 and have been with the organization since 2006, and worked for other wildlife and public lands conservation organizations in various capacities since 1988. In

my work I advocate for the protection and recovery of the Greater Sage-Grouse, a once abundant game bird whose population has dwindled from approximately 16 million to less than 300,000 today. In addition, the species is extirpated from half of its historic range, and much of the remaining habitat is degraded and fragmented by a variety of impacts including road construction, urbanization, oil and gas development, agriculture, mining, grazing and related invasive species expansion and fire, fences, communications towers, wind turbines and associated powerlines.

3. ABC is a 501(c)(3) non-profit organization whose mission is to conserve native birds and their habitats throughout the Americas. It achieves this by safeguarding the rarest bird species, restoring habitats, and reducing threats to bird species. ABC has more than 8,000 individual members and 60,000 constituents. ABC's members and supporters enjoy viewing, studying, and photographing migratory and resident birds. Some of its members and supporters routinely observe birds in sagebrush communities in states such as Utah, where energy development poses a serious threat to such habitat and to remaining populations of the Greater Sage-Grouse.

4. ABC uses a variety of mechanisms to achieve its objectives, including scientific research and analysis; advocating for bird conservation at the local, state, regional, and federal levels; forming bird conservation partnerships; and pressing for meaningful regulatory changes to address threats to birds through various means, including rulemaking petitions and litigation.

5. ABC and its staff, members, and supporters have a particular interest in reversing the sage-grouse's decline in Utah and across the Intermountain West. ABC drew attention to the threats faced by sagebrush habitat in 2006, when it placed it third in the list of The Top 20 Most Threatened Bird Habitats in the U.S., based on the damage caused by livestock grazing, oil and

gas development, and the spread of invasive cheatgrass. The sage-grouse was also highlighted on ABC's 2014 "Watch List" of birds of greatest conservation concern.

6. ABC has been working to reduce threats to sage-grouse from habitat destruction, including from oil and gas development. For example, ABC staff supports the Sage Grouse Initiative, which provides incentives for conservation easements on private lands and for better management practices. ABC staff and partners worked to ensure that regional planning initiatives for the Greater Sage-Grouse incorporated the best available science. Over the past five years, ABC supporters have sent tens of thousands of letters to Congress in support of the sage-grouse management plans, the 10-million acre mineral withdrawal, the mitigation policy, and to oppose roll-backs of the plans and exempting the grouse from Endangered Species Act protection.

7. ABC, its staff, members, and supporters also have an interest in protecting other bird species commonly found in the sagebrush communities, such as the Sage Sparrow and Brewer's Sparrow. For example, in 2015 ABC, in partnership with PRBO Conservation Science, published a guide for land managers with information on breeding season habitat for several bird species commonly found in sagebrush communities of the Intermountain West. See PRBO Conservation Science, American Bird Conservancy, Western Working Group of Partners in Flight, *Bird Habitat Guide: Sagebrush Communities in the Intermountain West* (2015), <https://abcbirds.org/wp-content/uploads/2015/05/SagebrushGuide.pdf>.

8. On behalf of ABC, I have been personally involved for over a decade in numerous efforts to conserve and protect the Greater Sage-Grouse and its habitats across the western United States. I am very familiar with the federal agency actions, policies, and plans adopted over the past decade regarding sage-grouse, including Endangered Species Act findings

by the U.S. Fish and Wildlife Service, and the land use plan amendments completed in 2015 by the Bureau of Land Management and U.S. Forest Service under the National Greater Sage-grouse Planning Strategy. I am also very familiar with information on sage-grouse populations and trends, and scientific studies and understanding of threats and adverse impacts to sage-grouse habitats and populations from activities such as energy development.

9. On behalf of ABC, I reviewed the BLM's draft Environmental Assessment for the September 2017 Oil and Gas Lease Sale in the Fillmore Field Office, Juab County, Utah, and was very concerned about BLM's proposal to conduct oil and gas leasing that threatens adverse impacts to the Sheeprocks sage-grouse population. I assisted in preparing comments and the protest of the BLM lease decision, on behalf of ABC, and believe that the leases pose significant and irreversible adverse impacts not only to the Sheeprocks sage-grouse population, but also to greater sage-grouse on a range-basis. There is abundant science underscoring the adverse impacts of oil and gas development and associated activities on sage-grouse habitats and populations, such that the Sheeprocks population – which is already small and declining – is threatened with extirpation, as Dr. Clait Braun explains in his accompanying Declaration. Moreover, maintaining such isolated or peripheral populations is important to maintaining the representation, resilience, and redundancy of Greater Sage-Grouse habitat and populations, as Dr. Haak explains in her accompanying Declaration and Dr. Braun confirms in his.

10. If allowed to proceed, the challenged lease sale would impair the interests of ABC's staff, members, and supporters who observe, study, enjoy, and otherwise benefit from the sagebrush habitat and birds in the lease sale parcels, surrounding area, and other sagebrush communities in central Utah. The nine lease sale parcels include existing and potential habitat for several bird species, such as the Long-billed Curlew, Loggerhead Shrike, Sage Sparrow,

Brewer's Sparrow, and Greater Sage-Grouse, all of which depend on sagebrush communities for breeding, nesting, and/or wintering. Oil and gas development on these parcels will decrease the abundance of these bird species and their habitat, resulting in fewer birds to view on the lease parcels and general area. ABC staff, members, and supporters would be irrevocably harmed from the loss recreational, aesthetic, conservation, and other interests in these public lands.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of October, 2017 in Washington, DC.

A handwritten signature in black ink, appearing to read "Steve Holmer", written over a light gray rectangular background.

Steve Holmer