

Attachments:

[NACD BLM GRSG Comments 2.7.21 .pdf;ATT00001.htm](#) 

Original mail: [EXTERNAL] National Association of Conservation Districts comments to Notice of Intent to Amend Land Use Plans Regarding Greater Sage-Grouse Conservation and Prepare Associated Environmental Impact Statements.msg 

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Mr. Preston and Ms. Deibert -

Please find NACD comments respond to the Notice of Intent to Amend Land Use Plans Regarding Greater Sage-Grouse Conservation and Prepare Associated Environmental Impact Statements.

I was not able to submit the comments via the online portal. Please advise.

Best,

Mary A. Scott
Natural Resource Policy Specialist
NACD



National Association of Conservation Districts

February, 7, 2022

Patricia Deibert
National Sage-Grouse Coordinator
440 W 200 S Suite 500
Salt Lake City, Utah 84101

RE: Notice of Intent to Amend Land Use Plans Regarding Greater Sage-Grouse Conservation
and Prepare Associated Environmental Impact Statements

Dear Ms. Deibert,

The National Association of Conservation Districts (NACD) represents America's nearly 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work collaboratively with federal, state, and other local resource management agencies, as well as private sector interest groups, to provide technical, financial, and other assistance to help landowners and operators apply conservation to the landscape.

NACD welcomes the opportunity to provide comments on the Bureau of Land Management (BLM)'s effort regarding the Greater Sage-Grouse (GRSG) resource management plans and recognizes the importance of well-managed species conservation. By allowing multiple use and engaging with state and local governments, including conservation districts, public lands can be managed to accommodate uses including wildlife resources, wildfire management, livestock management, and outdoor recreation. The health of local economies in any location under consideration should be well analyzed and taken into consideration when developing management plans. NACD recommends BLM use best available information and data while incorporating newly available science regarding impacts into the analysis and science previously overlooked or omitted; particularly related to livestock grazing, conifer encroachment, wild horse impacts, and adaptive management.

It is unclear if BLM intends to move this effort forward using similar planning areas or not but given the differences from state to state in geography, climate, priority threats to Sage-grouse, conservation approaches, and State and local plans, NACD does not believe a more regional approach for this planning process is warranted.

Relatedly, NACD also commented on all previous efforts by BLM to amend land use plans for Greater-Sage-grouse conservation. We supported the most recent effort by BLM to find better alignment with various states which resulted in the now enjoined 2019 Plans. To address the Court's concerns raised in its preliminary injunction, BLM completed a clarifying supplemental



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environmental impact statement (SEIS) which was followed by a subsequent Record of Decision in 2020. NACD believes this SEIS should be allowed to move forward, and the plans tied to it allowed to work because they are “closer to the ground” with the state-specific management needs and threats. NACD requests BLM include a preferred alternative in the current process to incorporate the 2019 Plans with the 2020 clarifications.

The best stewardship of natural resources and wildlife species takes place at the local level where those in the community are able to provide their expertise. NACD suggests BLM eliminate the blanket net conservation gain requirement and implement site-specific mitigation requirements, where appropriate and legal, based on site-specific data and conditions. The agency should also rely on state-specific sage-grouse management mechanisms, especially for compensatory mitigation (an example of this is the Nevada Conservation Credit System). Additionally, NACD encourages BLM address incorrect and inflexible use of landscape-scale mapping, require improved site-specific habitat mapping, and base management actions on field-verified habitat data. BLM should also consider eliminating landscape-scale maps for project level decision making and instead require site-specific, field-verified habitat data for project level decision making and any mitigation requirements, because this would allow management flexibility for ground-truthing of habitat and lek bluffs.

Collaboration with state and local governments, including conservation districts, supplies a tremendous resource to BLM, and these entities are able to provide insight when determining appropriate management tools. NACD encourages use of Ecological Site Descriptions (ESDs) and their associated State and Transition Models to frame conservation actions grounded in current rangeland science and the sites’ true ecological potential through coordination and collaboration with conservation districts. Regarding range-wide disturbance caps, NACD recommends BLM only apply these based on the best available science and not simply through an arbitrary “math exercise.” BLM should defer to state and local governments, including conservation districts, when developing or implementing any disturbance caps. Flexibility to adjust disturbance caps in accordance with updated data and/or science including site-specific conditions (such as ground-truthing) should also be allowed. Additionally, NACD encourages BLM to address Habitat Objectives in order to reflect the true ecological potential, based on Ecological Site Descriptions and Transition Models.

The previous sage-grouse management efforts focused on “limiting human influence on intact GRSG habitats,” especially where cheatgrass is present. To address current habitat degradation and the increasing effects of climate change, there should instead be a focus on increasing man’s management influence in these ecosystems to allow for active, progressive, and adaptive management. Focusing on true, adaptive management in the sage-grouse plans would address any variability, including climate. The decline in GRSG is coincident with the increase of regulatory schemes and bureaucratic hoops that must be overcome to do anything on the ground. This too has resulted in increases of extent and cycle of wildfires. Human influence has shaped where we are today and human influence must be focused, strategic, and targeted to keep managing these



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lands for GRS habitat and current and future generations. An example of successful managing is the work of USDA-ARS Research Station in Dubois, Idaho where active grazing management and prescribed burning to mimic the historic fire regime has created an increase in GRS when neighboring BLM land has continued to see a decline in GRS.

Wildfire remains a primary threat to sage-grouse and the American West. NACD urges BLM to use aggressive and improved methodologies for wildfire mitigation, especially pre-suppression fuels management on public lands. Good management of fire fuels and reduction of opportunities for catastrophic wildfires to rage across the west strengthen and protect the sagebrush steppe habitat and the communities dependent upon this habitat. Management tools, including livestock grazing, can effectively reduce the fuel load, especially of fine fuels and invasive annual grasses like cheatgrass. BLM should continue to work with local ranchers and stakeholders on targeted grazing as a management tool to create fuel breaks and reduce fuel load in or next to sage-grouse habitats. BLM should also continue to work toward developing outcome-based grazing initiatives to increase flexibility for livestock permittees and land managers to meet habitat objectives as conditions on the ground change. Furthermore, the development of a streamlined process to provide timely use of temporary non-renewable grazing animal unit months (AUMs), or a similar process, for targeted grazing and strategic grazing can reduce fire-prone invasive species, resulting in a more desirable ecological state.

Invasive species continue to challenge western communities and sage-grouse habitat, especially where species such as cheatgrass dominate areas after wildfire, and other weeds degrade important brood-rearing habitats like wet meadows. Strong invasive species management is needed as BLM continues to move forward with sage-grouse management. BLM should continue the use of native species to restore degraded rangelands when possible and conducive to any site's potential and beneficial nonnative species when necessary to stabilize sites from invasive species threats. Pinion and juniper encroachment into sagebrush ecosystems that sage-grouse rely on threatens the birds' habitat and life-cycle behaviors, as sage-grouse will avoid areas with even limited tree cover. Pinion-juniper control methods, including mechanical, chemical, prescribed fire, or a combination of all three, should be utilized moving forward. Analysis and mitigation to address impacts of predation of sage-grouse should also be taken into consideration. NACD encourages BLM to work with state and local governments, including conservation districts, and other appropriate federal agencies (such as U.S. Fish and Wildlife Service and USDA-Wildlife Services) to determine the most sensible approach to reduce the impacts of predation. Species such as the Common Raven have a disproportionate impact on sage-grouse but also have paradoxical protections under the Migratory Bird Treaty Act.

Consideration for the well-being and stability of local economies is a critical component when developing plans to move forward. BLM's plans must provide adequate regulatory mechanisms to protect, enhance, and restore local economies and preserve local culture throughout the entire range of sage-grouse. Well-managed sagebrush ecosystems not only provide habitat for the sage-grouse but also for other species such as mule deer, elk, pronghorn, and the golden eagle. In addition to habitat preservation, the American West is home to unique multiple use opportunities,



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including outdoor recreation and livestock grazing, that afford local economies the opportunity to succeed. NACD requests BLM include a socioeconomic analysis of proposed restrictions and management actions that need to be adopted, as this was not included in the last Land Use Plan Amendment (LUPA) Environmental Impact Statement (EIS).

Again, NACD thanks the BLM for the opportunity to provide input while the BLM moves forward with this process. On behalf of America's conservation districts, NACD would like to remind BLM that conservation districts are local government entities and are able to serve as a resource for bureau as the planning process proceeds to move forward. Conservation districts should be invited and allowed to participate as cooperating agencies in this effort. By engaging local governments, including conservation districts, BLM has the unique opportunity to interact with area experts, and while being given the opportunity to ensure that the viability of local economies and sage-grouse habitat are able to thrive in tandem.

Sincerely,

Michael Crowder
President, National Association of Conservation Districts