



November 30, 2017

Ms. Johanna Munson  
BLM- Idaho State Office  
1387 South Vinnell Way  
Boise, ID 83708

Submitted via DOI ePlanning portal: <https://eplanning.blm.gov/epl-front-office/eplanning/comments/commentSubmission.do?commentPeriodId=54848>

Re: Notice of Intent to Amend the Greater Sage-Grouse Resource Management Plan Revisions and Amendment(s)

Dear Ms. Munson,

The National Association of Conservation Districts (NACD) represents the 3,000 locally-led conservation districts across the country that help millions of landowners and operators manage and protect natural resources on private and public lands. Established under state law, conservation districts are local units of government that share a single mission: to work cooperatively with the private sector and federal, state, and other local resource management agencies to provide world-class conservation assistance.

With respect to habitat conservation practices, many conservation districts employ wildlife and range staff to assist both private landowners and land management agencies with wildlife habitat needs. This assistance includes recognizing the greatest threats to the species and supporting on-the-ground habitat conservation for multiple species.

In recognition of these efforts, NACD and Bureau of Land Management (BLM) in July of 2013, signed a Memorandum of Understanding (MOU). The MOU emphasized the importance of a cooperative working relationship aimed to support common goals and interests in conserving federal and private land resources. As BLM and the Department of Interior (DOI) move to amend the Greater Sage-Grouse Resource Management Plan (RMP) revisions and amendments, it is important to remain mindful of both ensuring a healthy range for the bird and the impacts any amendments may have on the surrounding communities.

NACD previously submitted comments to BLM and U.S. Fish and Wildlife Service in February of 2014 that recommended certain conservation practices be considered for all Land Use Plan Amendments. Those conservation practices can be found [here](#). Additionally, NACD was pleased with DOI's finding that the Greater Sage-Grouse did not warrant listing under the Endangered Species Act (ESA). While a review of these land use plans in and of itself is not detrimental to the achievements made with the original 2015 decision, any revisions or amendments to the original land use plans for this 10-state region must not move us closer to a listing of the species.

We know that many factors contribute to a species' decline in population and that not all the factors hold true in every state. Which is why the locally-led voluntary conservation efforts have



## National Association of Conservation Districts

proved effective and been critical in helping the Greater Sage-Grouse's recovery. It is fundamentally important that any review of the land use plans avoid a "top down approach" to habitat conservation and that DOI officials consult local and state officials and other stakeholders who have already invested multiple years working with a diverse group of stakeholders to develop their local land use and recovery plans. It is these local stakeholders who came together initially to prevent the need for an ESA listing of the species and their input must be considered to avoid a future listing.

NACD and the local governments it represents is focused on providing on-the-ground management and mitigation practices which are good for the bird, the land, and the local economies. We thank you for your efforts on this complex issue and look forward to continuing to work closely with the BLM and DOI in efforts to conserve Greater Sage-Grouse habitat.

Sincerely,

Brent Van Dyke  
NACD President