



National Association of Conservation Districts

February 21, 2014

The Honorable Neil Kornze
Director, Bureau of Land Management
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

The Honorable Dan Ashe
Director, U.S. Fish and Wildlife Service
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Mr. Kornze and Mr. Ashe,

On behalf of America's 3,000 conservation districts and 17,000 elected and appointed supervisors, thank you for your leadership in conserving the Greater Sage Grouse population in the Western United States. The National Association of Conservation Districts (NACD) supports Greater Sage Grouse conservation through voluntary management practices on both private and public lands. NACD is eager to work with the Bureau of Land Management (BLM), U.S. Forest Service (USFS), and U.S. Fish and Wildlife Service (USFWS) on a wide variety of needs for on-the-ground Greater Sage Grouse conservation.

Conservation districts are local units of government established under state law to carry out natural resource management programs at the local level. Districts work with millions of cooperating landowners and operators to help manage and conserve land and water resources on all private lands and many public lands in the United States. 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.

NACD recognizes that the Greater Sage Grouse is a high priority species being considered for listing as endangered or threatened. We also recognize that it is critical to preserve the local economies and culture throughout the Greater Sage Grouse range. Local communities and the productivity of the lands surrounding those communities are reliant upon each other, and conservation districts can be the key to provide much needed results and management where public and private lands are in close proximity. However, this can only be accomplished through close and ongoing communication between NACD and Federal Agencies.

The Memorandum of Understanding (MOU) signed between NACD and the BLM in July of 2013 emphasizes the importance of a cooperative working relationship aimed to support common goals and interests in conserving federal and private land resources. Our intent with this letter aligns with the mission of the MOU; to provide guidance and advice while remaining mindful of, in this case, both a healthy range of the bird and impacts on surrounding communities.

With the above in mind, we respectfully request that the BLM consider certain practices in all Land Use Plan Amendments with regard to the Greater Sage Grouse.

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NACD supports cooperative rangeland monitoring and the utilization of Ecological Site Descriptions with associated State and Transition Models with habitat determinations based on trend toward or away from a desired state. We support aggressive and improved methodologies for wild fire suppression and especially pre-suppression fuels management on public lands. The use of native species is important to restore degraded rangelands when possible. Nonnative species should be used when necessary to stabilize sites from invasive species threats. It is important to develop a streamlined process to provide timely use of Temporary Non-Renewable grazing Animal Unit Months (AUMs) for targeted and strategic grazing of fire-prone invasive species. We encourage adequate program funding for biological, strategic grazing, herbicides and biocides to control fire-prone invasive species and noxious weeds range-wide.

While the BLM and USFWS support range-wide disturbance caps, we can support them only when they are based on the best available science, with deference to development of any caps by state and local governments—including conservation districts—and with flexibility to allow cap adjustments according to updated data and/or science. We also support mechanical, chemical, prescribed fire, or combinations of these methods to control pinion-juniper, and other invasive encroachment into sage-grouse habitat.

Many factors contribute to a species' declining population; however, the impacts of predation are a growing concern. NACD respectfully requests the agencies provide an analysis and outline mitigation measures to address the impacts of predation on the Greater Sage Grouse.

NACD supports the use of Candidate Conservation Agreements on public lands as a voluntary tool to improve sage-grouse habitat, as well as the coordination of use with Candidate Conservation Agreements with Assurances' voluntary agreements for habitat improvement on private lands.

We strongly encourage the USFWS to consider conservation efforts that have been adopted and are being implemented on the ground when making a decision in the listing of the Greater Sage Grouse as either Threatened or Endangered, and oppose such listing based on regulatory mechanisms.

Thank you for your continued leadership on these complex issues. The highest concern of these local governments is providing on-the-ground management and mitigation practices which are good for the birds, the land, and the local economies. We look forward to working closely with you and the agencies involved in conserving the habitat and population of the Greater Sage Grouse.

Sincerely,

Earl J. Garber
President

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