



National Association of Conservation Districts

May 21, 2020

Mr. John F. Ruhs
State Director
Bureau of Land Management
1287 S. Vinnell Way
Boise, Idaho 83709

RE: Idaho Greater Sage-Grouse Draft Supplemental Environmental Impact Statement (DSEIS)

Dear Mr. Ruhs,

The National Association of Conservation Districts (NACD) represents America's 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 cooperatively with federal, state and other local resource management agencies and 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 draft supplemental environmental impact statements (DSEIS) on the Greater Sage-Grouse 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.

Cooperating with state and local governments, including conservation districts (CDs), 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 CDs. 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 CDs, 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.

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.



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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 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. We believe BLM's DSEIS goes a long way to doing so, with a few improvements based on our comments and suggestions. 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, including outdoor recreation and livestock grazing, that afford local economies the opportunity to succeed.

Again, NACD thanks the BLM for the opportunity to provide input while the BLM moves forward with the DSEIS 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 BLM as the planning process proceeds to move forward. By engaging local governments, BLM has the unique opportunity to interact with area experts, and BLM is given the opportunity to ensure that the viability of local economies and sage-grouse habitat are able to thrive in tandem.

Sincerely,

Tim Palmer
President
National Association of Conservation Districts