



June 13, 2024

Submitted Via: [BLM National NEPA Register](#)

Bureau of Land Management  
Attention: HQ-GRSG-RMPA  
440 West 200 South #500  
Salt Lake City, UT 84101

***RE: Greater Sage-Grouse Draft RMP/Draft EIS – GRSG RMPA***

Dear Bureau of Land Management:

NACD represents America's 3,000 conservation districts, their respective state and territory associations, and the more than 17,000 individuals who serve on their governing boards. Conservation districts are local units of government established under state law to carry out natural resource management programs at the local level by working with landowners and operators in every part of the country to manage and conserve land and water resources on private and public lands. Conservation districts share a single mission: to work cooperatively with federal, state, and local resource and land management agencies, and private sector interest groups to provide technical, financial, and other assistance to help landowners and operators apply conservation to the landscape. Conservation districts work hand-in-hand with all levels of government to ensure that programs, regulations, and initiatives are tailored to address various local resource needs.

NACD appreciates the opportunity to comment on the Bureau of Land Management (BLM)'s Draft Resource Management Plan Amendment/Draft Environmental Impact Statement (RMPA/DEIS) for greater sage-grouse habitat management and values the importance of species conservation informed by the best-available science and input from local, state, federal and Tribal partners. By continuing to provide multiple use access and engaging in regular coordination with state and local governments and stakeholders, including conservation districts, public lands can be managed to accommodate a variety of uses including wildlife habitat, wildfire management, livestock management, and outdoor recreation. Impacts on local communities and economies should be well analyzed and taken into consideration when developing or altering management plans. NACD encourages BLM to continue working with and maintain flexibility for communities already working to preserve and protect greater sage-grouse habitat within the multiple use framework.

In the DEIS, BLM provides varied alternatives for sustainable management, which include specific amendments to the greater sage-grouse management plans. Of the alternatives analyzed, NACD believes Alternatives 2 and 5, with a few additions we highlight below, are most compatible with

ongoing efforts to protect greater sage-grouse habitat in balance with local socioeconomic considerations. NACD appreciates BLM's recognition of current local efforts and the opportunities presented by creating consistency in management and the consideration and utilization of additional tools in BLM's toolbox to achieve substantial improvements in greater sage-grouse habitat.

State and local governments, including conservation districts, are a tremendous resource for BLM and provide integral local knowledge to help determine appropriate management tools. In addition to understanding local landscapes and needs, conservation districts work with partners to provide resources and assistance facilitating effective habitat restoration and protection.

NACD does assert that a few additions and clarifications in the EIS are warranted. NACD requests a more streamlined process to "ground-truth" habitat designations and make on-the-ground management more adaptive based on true habitat conditions. NACD also encourages better clarity on use of Ecological Site Descriptions (ESDs) and their associated State and Transition Models to frame greater sage-grouse conservation actions grounded in current rangeland science and a sites' true ecological potential through regular coordination and collaboration with conservation districts. NACD is encouraged by BLM's references to updated range science and the need for appreciable standards and recommends BLM only apply range-wide disturbance caps when no other alternatives are available. Additionally, 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.

Wildfires continue to pose significant threats to greater sage-grouse and their habitat in the American West. NACD urges BLM to use aggressive and improved methodologies to support wildfire mitigation, especially pre-suppression fuels management on public lands. Effective management of fire fuels and practices to reduce opportunities for catastrophic wildfires strengthen and protect the sagebrush steppe habitat and the communities they support. Management tools, including well managed livestock grazing, can effectively reduce the fuel load, especially of fine fuels and invasive annual grasses like cheatgrass. NACD encourages BLM to continue to work with local ranchers and stakeholders on targeted and prescribed grazing as a management tool to create fuel breaks and reduce fuel load in or adjacent to sage-grouse habitats.

BLM should continue to work toward developing outcome-based grazing initiatives to increase flexibility and support for livestock permittees and land managers to meet habitat objectives as conditions on the ground change. The development of a streamlined process to provide timely use of temporary non-renewable grazing animal unit months, or a similar process, for targeted and strategic grazing can also reduce fire-prone invasive species, resulting in more desirable ecological conditions.

Invasive species continue to pose serious challenges for western communities and greater sage-grouse habitat, especially where species such as cheatgrass dominate areas after wildfire, and other weeds degrade important brood-rearing habitats including wet meadows or leks. Strong invasive species management is needed to address the issues facing greater sage-grouse habitats. BLM

should continue the use of native species to restore degraded rangelands when possible and beneficial nonnative species when necessary to stabilize sites from invasive species threats. Science has shown that pinion and juniper encroachment into sagebrush ecosystems threatens the greater sage-grouse's habitat and life-cycle behaviors, as the birds will avoid areas with even limited tree cover. Pinion/juniper control methods, including mechanical, chemical, and prescribed fire should be actively utilized moving forward. Analysis of and mitigation practices to address the impacts of predation on greater 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 (including the U.S. Fish and Wildlife Service and USDA-Wildlife Services) to determine the most sensible approach to reduce the impacts of predation. For example, species such as the Common Raven have a disproportionate impact on sage-grouse, but also have protections under the Migratory Bird Treaty Act.

It is critical to consider the well-being and stability of local economies when developing species and habitat management plans. BLM's greater sage-grouse management plans must provide adequate regulatory mechanisms to protect, enhance, and restore local economies and preserve local culture and social stability. NACD believes Alternatives 2 and 5 in BLM's DEIS take important steps to bolster this objective and encourages continued coordination and cooperation in fine tuning to maximize greater sage-grouse conservation in balance with the socioeconomic needs of local communities. Well-managed sagebrush ecosystems not only provide habitat for the sage-grouse, but also support additional species such as mule deer, elk, pronghorn, and the golden eagle. The American West supports a wide range of important activities within the multiple use framework, including outdoor recreation and livestock cultivation. It is crucial that BLM continue to support additional activities within the multiple use framework and recognize their importance to local communities.

NACD thanks the BLM for the opportunity to provide input to inform the DEIS process and looks forward to working with the agency to ensure local communities and conservation districts are at the forefront of management efforts. NACD encourages BLM to utilize conservation districts' unique local knowledge and experience to help inform the development of greater sage-grouse management systems. Working closely with all stakeholders, BLM can ensure that local economies and sage-grouse habitats are able to thrive in tandem.

Sincerely,

A handwritten signature in black ink that reads "Kim LaFleur". The signature is written in a cursive, slightly slanted style.

Kim LaFleur,  
NACD President