Sage-grouse Amendment Comment
USDA Forest Service Intermountain Region
Federal Building
324 25th Street
Ogden, UT 84401

To whom it may concern:

The undersigned organizations, representing agriculture, natural resources and land managers across the country submit the following comments to the Greater Sage-Grouse Plans.

Our combined memberships urge the Administration to continue working with local stakeholders and leaders on enhancing the plans through policy guidance and on the ground implementation. While there are issues with the plans that can be improved upon, we stand ready to work with the U.S. Forest Service (USFS), the Bureau of Land Management (BLM), local working groups, and state leaders to find a path forward in the current plans instead of taking on the arduous task of starting over. The following items are points to consider as we look to augment the current plans. These comments are made in the same spirit of cooperation that has marked the development and success of the sage-grouse plans thus far. For sage-grouse to continue to thrive on working landscapes, we need to continue to work together to implement these plans, and that includes inter-agency cooperation between the BLM and USFS.

We encourage USFS to utilize the simplest legal processes available to improve the current plans so that our members can better achieve the state goals of sage-grouse conservation working in tandem with ranching. Our members have spent countless hours over the past 15 years in meetings about sage-grouse management. We encourage USFS not to start over, but to find ways to maintain those sections that work and to identify and improve upon those sections that have been met with obstacles. While not perfect, the plans reflect the input and work from producers, leaders, and land managers across the country. USFS must use the significant work built within these plans and in large part contributed by Governors’ local working groups in each affected state, to enhance and implement the current plans, rather than start over with new plans and likely new lawsuits.

Furthermore, we encourage USFS to consider the whole sagebrush ecosystem, such as wildlife, special status species, invasive species, fire, and wild horses, when reevaluating the guidelines and management plans. Details must be site-specific, while also recognizing the needs of the many species that share the ecosystem. Our members’ livelihoods depend on the sustainable and successful management of working landscapes. All plans must take into account the producers and livestock who contribute to the health of the ecosystem. As research and science continue to evolve on this issue, the management plans must be adaptive to incorporate updated and new data collected through field experience. Consistent with our overall views, this flexibility should be inherent in the plans so that lengthy administrative processes are not required, or opening the plans to new rounds of litigation, as new data and management become available.

The current plans should be modified to take into account feedback from agriculture stakeholders. That requires BLM continuing to work together with ranchers, local government, local federal agency personnel, and other stakeholders. The following suggestions will improve the plans and their implementation, while also taking into account the conservation of the working landscapes:
• Reevaluate the desired habitat condition tables, provide guidelines for site-specific management, and provide direction for use of any habitat guidelines. Each of the guidelines in these tables (i.e., grass and forb height and cover numbers) need to be treated as guidelines and not minimum standards. These tables are among the most troublesome parts of the plan to apply on the ground. They are not creating better habitat, but rather, are limiting good management by attempting to create conditions outside of site potential and these conditions may not benefit sage-grouse habitat.

• Create guidance to field offices that desired conditions – particularly range-wide conditions as included in the current plans – are not appropriate as grazing permit terms and conditions. Adopting guidelines as terms and conditions eliminates opportunity for flexibility in management and enforcement. If adopted as terms and conditions, USFS will be forced to take action against permittees, even when conditions were not met for reasons not attributable to grazing (i.e., drought, wild horses, site potential, and hail damage). Ranchers were assured during the plan development process that good management and continued grazing could continue. Some early indications from plan implementation show this not to be the case.

• Develop site-specific management objectives and conditions for desired outcomes. The current habitat condition tables have the same requirements across the range of the plan, and most of the attributes are the same, or similar, across the western United States. However, site potential and growing conditions vary greatly across the West. The same guidelines cannot be applied range wide. Habitat guidelines need to be science-based and site-specific. The desired habitat conditions tables should be removed from the plans and site-specific metrics developed based on site-specific data should be used as a replacement. Each aspect of the desired habitat conditions tables should be reevaluated.

• Clarify policy on how the plans, and specifically the habitat guidelines, will be implemented. Local field personnel need direction on how guidelines will be applied and how to provide the flexibility that is needed on a site-specific basis as was originally intended in the plans. Regional and national offices must coordinate so that plans are both site-specific and consistent across plan boundaries.

• Create and provide training for USFS, conservation groups, and ranchers to understand how to make effective and consistent management decisions for habitat and ranching. Train local agency personnel to use the flexibility in the guidelines to develop site-specific, science-based standards to measure the success on the ground and improve habitat management.

• Develop protocols to create site-specific guidelines to update habitat mapping as more data becomes available. Allotment management plans need to be based on ecological sites, burn history, and invasive weed history.

• Create a process for conflict resolution. Habitat and the sagebrush range is dynamic and decisions will often involve an adaptive strategy. Understanding how to talk through our differences will lead to a better long-term strategy for people, livestock, sage-grouse, and wildlife.

• Continue local education and outreach on how the plans work—especially around certain elements such as Sagebrush Focus Areas (SFAs) which were designed to identify key habitat strong-holds, but not eliminate ranching. As written, the SFAs are unnecessary and should be eliminated.

• Provide policy guidance and enforcement direction to manage wild horse populations where they exceed Appropriate Management Levels or are contributing to not meeting habitat objectives.
• Lek boundaries need to be site-specific and recognize the mixture of private and public lands and their importance to healthy habitat.

Feedback from the first two field seasons under the current plans have shown that there are several areas that need attention and reinforce the need for constant updating with new data:

• On-the-ground monitoring is showing that habitat boundaries included in the plans need revision. USFS needs to develop protocols for site-specific data to be used to update habitat maps. USFS should develop protocols to appropriately identify each habitat category so that areas can be appropriately mapped.

• Areas that have been burned and converted to annual grasslands need to be remapped to their new potential.

• Habitat condition descriptions are being proposed as new terms and conditions for grazing permits. This should be stopped.

The undersigned groups thank the USFS for the opportunity to comment to the Greater Sage-Grouse Plans. We look forward to working with the agency to improve the plans and drive progress to our shared goal of enabling greater sage-grouse and other sagebrush-dependent species to continue to thrive on working landscapes across the West. We can work together now to improve the plans we have, rather than start over. This can best be achieved by working on the ground and on the landscape, not sitting in meetings and courtrooms.

Sincerely,
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