



Western Counties Alliance

January 27, 2014

Bureau of Land Management
Attn: Greater Sage-Grouse EIS
1340 Financial Blvd
Reno, NV 89502

RE: Nevada-Northeastern California Greater Sage Grouse Draft Land Use Plan (LUP) Amendment and Environmental Impact Statement (EIS)

To Whom It May Concern:

On behalf of the counties within the Western United States, we submit the following comments on the BLM/Forest Service sage grouse management proposals. The Western Counties Alliance (WCA) is a non-profit organization, established for the purpose of giving western counties a greater voice in support of well managed multiple use of public lands and natural resources in federal policies. It is the mission of WCA to promote a strong economic development atmosphere for counties alongside reasonable conservation of natural resources.

The future management of sage grouse has the potential to have a large economic and ecologic impact within western counties, across land ownership boundaries. For this reason, WCA is very concerned about the proposed changes to the land use plans for Bureau of Land Management (BLM) and U.S. Forest Service (USFS) lands. We understand the need for the agencies to develop new management guidance for the conservation of sage grouse in order to meet the requirements of U.S. Fish & Wildlife Service's status review. However, we have several concerns about how the management prescriptions within the LUP are unnecessarily restrictive, lack adequate scientific justification, and do not consider local conditions and local conservation efforts. The following comments detail our concerns regarding these proposals westwide, along with suggestions for supporting the economies of western communities while offering ample conservation efforts for sage grouse.

General Concerns

In general, we are concerned that the proposed amendments and EIS will result in a system where the agencies' management is centered solely on a single species rather than for multiple uses and multiple species, regardless of whether or not an endangered species listing is found to be warranted for sage grouse.

Much of the information and alternatives within the LUP is based on the BLM's National Technical Team (NTT) report. We find great fault with this report and in its development and therefore cannot support any alternative based on it. The NTT report did not include input from Any affected stakeholder or interdisciplinary experts aside from state and federal scientists and specialists, it ignores regional variances in sage grouse needs, is not a comprehensive representation of the literature and research surrounding livestock grazing and other uses, and

has not been scientifically peer reviewed for accuracy. For these reasons, any alternative based on the NTT report is not justifiable.

Economic Impact

One of our chief concerns about the LUP is that it does not adequately address the impact to western economies if the proposed sweeping land use restrictions were to be implemented. The economies of the rural counties of the west are centered around the use of federal lands. If that use is curtailed, or even halted, as proposed in the LUP for some uses, the county-wide impact would be devastating, not just to those individuals who directly make their living from resource use, be it grazing, mining, or drilling, but to the entire economic structure of the county.

The LUP focuses its portrayal of the socio-economic impacts on the entire planning area but does not adequately review the effects of the proposed land use restrictions on specific areas, including individual counties. Thus, the LUP undermines the true impact of its application to the social structure of local communities and to the economy of the western economy.

Threats to Sage Grouse

A. Wildfires

As referenced in the LUP, wildfire is generally considered to be the primary threat to sage grouse across its range. Unfortunately, the effect of the LUP will not be forestall the prevalence of wildfires but likely rather increase the threat. Much of the proposal focuses on limiting grazing. We maintain that this will only heighten the risk and frequency of catastrophic wildfires. Rather, the plan should focus on using livestock grazing as a preventative tool.

Also, the plan should seek to empower local firefighting efforts, such as the Rangeland Fire Protection Associations (RFPA) in Idaho. Locally affected landowners and public land users are often the first on the scene when a fires starts. The catastrophic spread of fires can be greatly reduced if the agencies cooperate with the local people and jurisdictions. This will go much further in protecting the sage grouse than in any use curtailment.

B. Noxious Weeds

Noxious and invasive weeds are also considered to be a threat to sage grouse. Active and flexible management is needed in the battle against these invasive species. This is best provided through the existing county weed control processes. However, many of the proposed alternatives only deter cooperative management and on-the-ground decision-making which is critical to fight against the spread of weeds, let alone overall land management.

C. Predator Control

Although the LUP accurately states that the BLM and USFS do not have management or control authority over predators, we are concerned about the very real threat that the overabundance of predators have on sage grouse. Because the LUP is proposing to alter land use activities to protect the species, it must be stated in the selected final alternative that before land use is limited, adequate measures must be undertaken to limit predator populations. Regardless of the amount of perceived suitable habitat for sage grouse, if predator populations are above sustainable and natural levels, they will have a big impact on the survival of the sage grouse species. It cannot be overlooked that the decline of sage grouse closely mirrors both the decline in grazing numbers on public lands and the decline in predator control efforts.

Importance and Protection of Existing Land Uses

A. Livestock Grazing

Although not found to among the primary threats to sage grouse, livestock grazing will unfortunately bear much of the brunt of proposed alternatives because it is the most convenient use to adjust for the BLM and Forest Service, regardless of its truly limited impact on the species. The LUP is in error in establishing additional, arbitrary habitat guidelines and standards for grazing and in its obvious goal to reduce grazing on public lands. Furthermore, the LUP has overlooked the need to review, study, and prove the adequacy of their existing regulatory mechanisms for managing sage grouse habitat. The BLM & USFS should have analyzed the effectiveness of current rangeland health standards and guidelines before developing alternatives, and should have used that analysis for considering appropriate changes to the RMP with respect to livestock grazing and range management.

Sound scientific research indicates that grazing is beneficial to the sage grouse and other flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires, improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse, and can be used to control invasive weeds. Furthermore, grazing with appropriate range improvements can be utilized in some areas to improve sage grouse habitat to mitigate for the disturbance caused by other multiple-use activities.

B. Energy Development and Mining

The proposed alternatives within the LUP seek to limit, if not close, oil, natural gas, and mineral development. The cumulative impact of the closures and designation in the LUP may preclude energy development within the planning areas, undermining the land's potential for oil, gas, and mineral potential. Under the Federal Land and Policy Management act, oil and natural gas development and mining are defined as a major use of public lands. Therefore, BLM is required to foster and develop energy and mineral development, rather than restrict and prohibit such development.

State and Local Conservation Efforts

At the direction of then-Secretary of Interior, Ken Salazar, several western states have undertaken a collaborative effort to develop state-led sage grouse conservation plans. Because these efforts are locally-driven and developed with input from a wide variety of stakeholders from within the respective states, they offer the greatest potential for success in conserving sage grouse habitat in harmony with sustainable use of the land. In all planning areas, the LUPs should largely defer to these state efforts and management plans.

Additionally, for the past several years, thousands of volunteer man hours have been devoted to sage grouse conservation through locally-led efforts such as local working groups. Countless conservation projects have been applied to the land through such efforts. This work must not be overlooked but should be emphasized and empowered through the LUP. These local efforts represent the best methods for achieving species conservation while recognizing the importance of continued land use activities. Such changes as are proposed in the LUP should also merit the involvement and discussion of the locally-impacted population, where applicable.

Unfortunately, as it stands, the overly burdensome restrictions in the LUP would only prove to disenfranchise those individuals who have previously felt compelled to work in local conservation efforts.

Collaboration

Many counties have obtained cooperating agency status with the BLM and USFS in the sage grouse issue, yet their input has largely been overlooked in the development of the LUP and its alternatives. We maintain that the agencies should truly utilize the expertise and local knowledge afforded to them through this status, both in the selection of the final alternative and in its implementation.

Adaptive Management

The LUP often cites that decisions will be made or changed based on adaptive management. We fully support the need to adaptively manage the species and its habitat based on local conditions and site-specific threats. We encourage the agencies to implement a system of truly adaptive management that allows them to change management use and restrictions as new information is obtained about the sage grouse species and as its threats change. The LUP should not be so rigid as to prevent what is best for the species and its unique needs within its populations.

Conclusion

WCA appreciates the opportunity to provide our insight and perspective to this process. We strongly encourage you to consider the above outlined concerns as you move forward in finalizing this LUP.

Sincerely,



Chairman, Western Counties Alliance
Carbon County, Utah Commissioner



Vice Chair, Western Counties Alliance
Mineral County, Nevada Commissioner