

December 1, 2017

The Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
Washington, D.C. 20240

Dear Secretary Zinke:

We write today with comments to inform the public scoping period announced by the Bureau of Land Management (BLM) on October 11, 2017 (82 FR 47248) exploring potential amendments to the greater sage-grouse land-use plans. We appreciate the opportunity to share our perspective on this important issue.

The Western Landowners Alliance (WLA) represents over 14 million acres of western rangelands and forest through its members. As the natural resource challenges facing western states fail to discriminate against geographic, political and ownership boundaries, our organization believes that achieving enduring outcomes for conservation must involve close partnership with private landowners and producers. That principle certainly applies to the situation today involving the greater sage-grouse: the success of historic conservation efforts across 11 western states will be determined, at least in part, by whether families on the land managing critical sage-grouse habitat are full participants in the process.

An important part of WLA extending its support for the 2015 sage-grouse land-use plans announced by the BLM and U.S. Forest Service (USFS) was the accompanying commitment at the federal level to provide voluntary conservation incentives to landowners and producers through the Department of Interior (DOI) and the Department of Agriculture (USDA). Among other efforts, the USDA-led Sage Grouse Initiative (SGI), now nearly eight years old and representing a partnership of 1,500 producers across 5.6 million acres of the American West, is a great example of how the government can work directly with farmers, ranchers and private businesses to meet public expectations for sage-grouse conservation while also supporting the livelihoods of families on the land.

Some WLA members and partners have been discussing the issue of sage-grouse conservation with public, private and nonprofit interests since the first petitions seeking protection for the bird arrived at the U.S. Fish and Wildlife Service (FWS) in 1999. Many individuals and organizations assumed significant time and financial burdens along with reputational risks by engaging directly and publicly on this issue and helping to steer it toward an outcome capable of meeting a diversity of demands and expectations, including those passed down through judicial review. We should honor the many partnerships and commitments forged in the service of sage-grouse recovery by protecting, to the greatest extent possible, the BLM-USFS land-use plans and allowing them to be carried out as designed. We are hopeful that BLM can achieve any necessary modifications identified during the scoping period through clarifications of policy, guidance and science that improve the experience for landowners and producers while working toward the same conservation outcome sought in the land-use plans.

Accounting for Local Conditions

As you know, the 2015 sage-grouse agreement, alongside the decision by FWS not to list the species for protection under the Endangered Species Act (ESA), was predicated on years of substantive conversations and political leadership at the regional, state and local levels. That the debate over sage-grouse conservation began “close to the ground” is essential to understanding why many farmers, ranchers and environmental advocates were willing to back the same outcome for sage-grouse conservation as a significant share of the environmental community. With that in mind, it makes sense that the majority of comments received by WLA through public events, meetings and private conversations pivot on the importance of ensuring that local conditions are accounted for in the land-use plans, rather than holding landowners, producers and businesses accountable to guidelines that may be practicable on one end of the sage-brush sea but not necessarily the other. We believe in maintaining abundant, healthy sage-grouse habitat, and while the underlying management principles to do so are consistent across the sage-grouse range, key management practices and monitoring foci may differ among locales.

The oft-cited “Table 2.2” included in the land-use plans—*Habitat Objectives for Greater Sage-Grouse*—is an illustrative and flashpoint example for the tension between having consistent standards toward which all landowners and producers should strive and the necessity of capturing local situations in order for those standards to prove useful for monitoring and enforcement activities. It is reasonable that the BLM maintains science-driven, broadly-applicable objectives for sage-grouse conservation in the pursuit of consistency and fairness. But it is also true that the underlying conservation mission is diminished when well-intentioned landowners and producers have little hope of achieving ill-fitting objectives, making it less likely that good management is recognized and rewarded, and that shortcomings are remedied.

As the BLM concludes the public scoping period and synthesizes comments received from across the 11 affected states, WLA believes there is an opportunity to enhance the user-friendliness and durability of the land-use plans by empowering agency field offices, where possible, to craft implementation guidance based on site conditions and with input from local interested parties. Such site-specific guidance should also inform terms under which the agency issues grazing permits, allowing producers some flexibility to work with field office employees on management plans that are focused on conservation outcomes and can be enforced fairly. The BLM would be well-served to augment these efforts at the national level by ensuring that field office employees have appropriate authority and training to carry out the site-specific reforms effectively and by helping to ensure that the new guidance is consistent with overall conservation goals for sage-grouse habitat.

Staffing, Training and Conservation Funding

WLA acknowledges the increased workload at BLM associated with the sage-grouse review and understands that the agency field offices will assume a share of that burden as the public scoping period concludes and reforms are considered. We first urge the BLM to work closely with leaders in Congress to ensure that the agency is funded at the national and local levels to carry out the process effectively and transparently. Landowners and producers share the worthy goals set forth by the BLM at the beginning of the scoping period to enhance collaboration with the states and ensure that sage-grouse conservation efforts are rooted in science and management activities supported by local conditions. We appreciate the work involved in fulfilling these goals and are hopeful that Congress

will honor the continued work of the states, including the leadership of governors in the 11 western states with sage-grouse habitat, by resourcing the agency at appropriate levels. Part of that agency resourcing should also include movement toward nominating and installing a director at the BLM.

In addition, WLA also emphasizes the importance that the BLM field office staff who work every day with landowners and producers receive the training and authority they need to succeed. Should the BLM pursue reforms designed to reflect local conditions and increase flexibility for permittees, the success of those efforts will depend heavily on the agency-producer interactions and the crafting of site-specific, science-based management plans capable of withstanding public and legal scrutiny. Along with training, WLA recommends that BLM continue educating communities about its sage-grouse conservation efforts and, where practicable, engage and partner with local organizations on the ground to enhance outreach.

Finally, as reflected in the Memorandum of Understanding signed by the BLM, USFS and the Natural Resources Conservation Service (NRCS), conserving the greater sage-grouse and its habitat necessarily requires coordination across government agencies. WLA shares the view of the Western Governors Association and many others that incentives for voluntary conservation, especially those authorized through the Farm Bill, are an important component of species recovery and making landowners and producers full partners. While the BLM does not administer the Farm Bill conservation programs, we know already through existing enrollments that sound management of sage-grouse habitat is advanced and overall recovery efforts are more likely to succeed when farmers and ranchers have ready access to these tools. WLA will continue to advocate for strong funding of USDA conservation programs as Congress continues the process of reauthorizing the 2014 Farm Bill and encourages the BLM to work closely with lawmakers to the same end.

We appreciate your commitment to landowners and producers and your consideration of our perspective on greater sage-grouse conservation. Please do not hesitate to reach out if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lesli Allison', written in a cursive style.

Lesli Allison
Executive Director