

Montana Wildlife Federation ♦ Anaconda Sportsmen Club ♦ Helena Hunters and Anglers
Montana Trout Unlimited ♦ Montana Bowhunters Association ♦ Laurel Rod and Gun Club
Theodore Roosevelt Conservation Partnership ♦ Montana Backcountry Hunters and Anglers
Mule Deer Foundation ♦ Hellgate Hunters and Anglers ♦ Gallatin Wildlife Association

November 30, 2017

Mr. Brian Steed
Acting Director
Bureau of Land Management
Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Mr. Steed,

Hunters have long valued the sagebrush-steppe that holds over 350 species of wildlife and native plants including pronghorn antelope, mule deer, the greater sage grouse and the plants they need to thrive. The vast majority of sagebrush steppe is on public land – owned by all Americans and held in trust for future generations. This public land also provides true multiple uses such as grazing, hunting, fishing, as well as mineral exploration and development. It also supports a thriving and growing outdoor recreation economy. Ensuring those critical habitats are managed against the rising tide of invasive species such as cheatgrass, restoring public lands after wildfires so as to return these lands to their productive uses for both livestock producers and wildlife, and ensuring that development is not done at the expense of species in need of vast open-spaces that our public lands provide is essential.

That's why the undersigned sportsmen conservation organizations are writing in regard to the Department of Interior's decision to revisit the Sage Grouse Plans put in place in 2015. Our organizations represent thousands of Montana outdoor enthusiasts who support multiple-use public land management and on-the-ground wildlife conservation. As such, we believe all Americans should have a say in how those lands are managed, and that management must reflect the honest investment that hunters and anglers have put in to managing these public lands through collaborative efforts and citizen engagement.

No substantial changes to the plans are needed. These plans were the result of an extended and extensive process to develop a workable framework to conserve sagebrush ecosystems and permit other ongoing uses of the affected public lands. That work resulted in the U.S. Fish and Wildlife Service finding that the greater sage-grouse no longer warranted listing under the Endangered Species Act. This is the reason that the Western Governors Associations' Sage Grouse Task Force has indicated that wholesale changes to the plans are not needed. Changes

that rise to the level of an amendment are likely to undermine the overall structure of the plans and their ability to succeed, leading to a very real situation where the greater sage grouse could be listed under the Endangered Species Act. None of us desire that outcome, which is why we support the plans as written, with minor changes based upon the input of the states that manage the species and their wildlife management agencies. Given natural fluctuations of grouse populations, objective measurement of management techniques will require at least 5 years of field data. Objective measurement of management impacts is required for real adaptive management. It would be disingenuous to alter publicly committed plans before their effectiveness is measured. We should let the plans continue to work, monitor them, and focus on ways to ensure their success.

In Montana, the real possibility of impacting private land efforts to restore grouse habitat could also be put in jeopardy. Over 70 percent of sage grouse habitat is on private land. Changes to the BLM plans will throw out long term efforts to place conservation easements on critical private land habitat, will cloud the future of the state program depending on litigation that is sure to come, and will slow down the work already being done to manage public land for all uses, including wildlife.

A wealth of science supports the current structure of the plans and does not support major changes. We strongly discourage changing the habitat focus employed by the state and federal plans. We also do not support the elevation of unproven tools like captive breeding programs or predator control over conserving and restoring priority habitat needed by sage grouse and other sagebrush-dependent species. Habitat conservation is the foundation for successful ecosystem conservation, including the sagebrush steppe in the West. That same conservation model is embodied in the 2015 Sage Grouse Management plans.

When the notice of intent was released, this kicked off a truncated comment period of only 45 days. This is a woefully inadequate amount of time to make meaningful comments on plans that in some instances took over 12 years to develop through local stakeholder processes. Therefore, we respectfully request workable comment periods, public meetings and sharing of information throughout the process. The first step to that end is extending the comment period from 45 days to 90 days. In addition, efforts by states or state fish and wildlife agencies to conduct stakeholder outreach should be supported by the Interior Department and their results incorporated.

Collaboration and compromise are the bedrock of the original plans and the bedrock of our western conservation ethic. Westerners put aside their differences and worked with local, state and federal agencies for years to better manage habitat, fire and noxious weeds on public lands, and prevented the need for a sage-grouse listing under the ESA. We ask that you keep this historic collaboration and conservation effort moving forward and request any future decisions in regard to federal sage grouse plans be developed in an open and transparent process that we may engage in further. Sportsmen and sportswomen value the sagebrush ecosystem that is home to more than 350 different species of plants and animals, including such iconic species like mule deer, pronghorn and elk that are important to our groups, our economy and our Western way of life.

Sincerely,

Dave Chadwick
Executive Director
Montana Wildlife Federation

Gary Oldhouse
President
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