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### COMMENTS FOR SELECT FEDERAL NATURAL RESOURCE MANAGEMENT COMMITTEE GREATER SAGE GROUSE MANAGEMENT PLAN

June 5 Meeting  
Rock Springs, Wyoming

The State of Wyoming has been successfully managing sage grouse habitat and corresponding populations since an initial State Plan was developed in 2002. Habitats have seen significant improvements, and the sage grouse population has remained stable, subject to annual fluctuations. Protection for Core Areas was formalized through the Governor's Executive Order in 2010. The Executive Order has been expanded and refined several times subsequently. The BLM Sage Grouse Plan for Wyoming, finalized in 2015 and revised in 2019 has generally been consistent with the State Plan as related to livestock grazing on BLM lands.

The Preferred Alternative, Alternative #5, as presented would not appear to have significant broad impacts on continued grazing. However, there are several specific areas of concern including the following:

1. It is unclear whether the BLM is proposing to adopt a final plan for Wyoming as we currently have, or just to identify certain state specific provisions in one multi-state plan. Wyoming should seek a state-specific plan.
2. Language indicating that existing range improvements could be required to be removed or relocated due to proximity to a lek is unacceptable. The presence of the lek is clear indication that the improvement is not an interference.
3. Grazing permittees/lessees currently strive to meet rangeland health standards that were developed for Wyoming with input from the Wyoming Resource Advisory Council (RAC). The adoption of sage grouse habitat specific standards to be applied throughout the west ignores the variability of resources and is unacceptable.
4. A provision providing that, if grazing within a sage grouse habitat is voluntarily relinquished by the permittee, the BLM has the option to place area into a "reserve common allotment" or a fire break and not be made available to another qualified applicant is in conflict with the Taylor Grazing Act.
5. The analysis and discussion of the impacts on grouse from predation is faulty. BLM attempts to relay the blame for predation on habitat conditions, failing to recognize and address the direct need for predator control.

*"Shaping and Living The Code of The West"*

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6. The Preferred Alternative does not include the designation of Areas of Critical Environmental Concern (ACECs). However, Alternative 3 would designate 11,139,472 acres of ACES's strictly for the protection of sage grouse habitat. This would be a total abuse of the agencies ACEC authority. It is essential that Wyoming strongly oppose the designation of any ACEC's in the final plan.

The successful management of sage grouse habitat requires consistency over time. Significant changes to the management plan with each change in federal administrations is a formula for failure. The 2015 BLM Plan as modified in 2019 should be given the opportunity to succeed.