

November 30, 2017

The Honorable Ryan Zinke, Secretary  
U.S. Department of the Interior  
1849 C Street NW  
Washington, D.C. 20240

Dear Secretary Zinke,

On behalf of the millions of hunters, anglers, shooters and outdoor enthusiasts that our organizations represent, we are writing in response to the Federal Register Notice: FR Doc. 2017-21958 Filed 10-10-17 to amend federal sage-grouse conservation plans. Many of our organizations' have extensive experience with sage-grouse, conservation planning, federal, state and private lands wildlife management, and we all value the sagebrush ecosystem and the benefits that balanced conservation efforts will provide sportsmen and women and the outdoor recreation economy.

In early September, five of our organizations sent Deputy Secretary Bernhardt a detailed analysis of the Secretarial Order and Report (see attached), highlighting the recommendations to exhaust all administrative, training, clarification and guidance options to resolve remaining issues with the states rather than opening the federal plans to lengthy amendment processes. While our groups may support targeted amendments to resolve issues that cannot be dealt with administratively, we do not believe those administrative options and stronger guidance have yet be fully utilized prior to the Notice of Intent to amend the federal plans.

Below, we summarize our key issues and points regarding the Secretarial Order, report recommendations and Notice of Intent to amend these plans:

- We support first using all administrative, training, and guidance and clarification approaches to address remaining issues with the federal plans. Our groups could support some targeted amendments to the plans once all other options have been exhausted, but we do not support major changes associated with amendments to the federal plans, which could take years to complete and threaten implementation and conservation outcomes. Any amendment changes must be defensible and supported by past and current scientific information.
- The Policy to Evaluate Conservation Efforts (68 FR 15100) used by the Fish and Wildlife Service was instrumental in the 2015 not-warranted decision. However, the requirements of certainty of implementation and effectiveness of the plans must be met for those assurances to manifest and support the Service's not-warranted decision for sage-grouse.
- The current federal plans balance the conservation and management of sage-grouse priority habitat with energy development. The weight of evidence from more than 25 studies is clear that infrastructure development associated with energy development negatively impacts sage-grouse. Further reducing restrictions on development within priority habitat would be ill-advised and invite further litigation. All sage-grouse habitats indeed are open for leasing, subject to current no surface occupancy (NSO) buffers, disturbance caps, and other stipulations that should remain in effect until scientific evidence supports changes to these requirements.
- We recommend allowing the federal plans and habitat conservation measures to be implemented and monitored in an adaptive management context to evaluate their effectiveness as well as

opportunities to modify management prescriptions when appropriate based on new information supporting those modifications.

- We are deeply concerned about how managing to meet population numbers has been portrayed, and emphasize that decoupling populations from habitat conservation is unscientific and unacceptable – the two simply cannot be considered independent of one another. Furthermore, the states should decide if and how any population goals are established.
- The best available science indicates captive rearing does not work for native prairie grouse and cannot mitigate for habitat impacts under any circumstance.
- Mitigation is fundamental to the future of sage-grouse conservation and this conservation tool should be retained in all state and federal plans. We do recognize that further definition of some associated terminology would be required.
- We support continued, well managed grazing on public lands in the sagebrush ecosystem. The current federal plans have considerable flexibility built in to address local site, climatic and grazing conditions and remaining issues with the states and permittees can be resolved with administrative tools, training for BLM staff, and clear direction and communication to field offices on implementation.
- We encourage the Department and BLM to support the administrative implementation of the language in HR 3543 and S1417, the Sage-Grouse and Mule Deer Habitat Conservation Restoration Act. This management legislation will greatly enhance not only sage-grouse and mule deer habitat, but also many other species of plants and animals dependent on the sagebrush ecosystem.
- We encourage the Department to partner with and support the Department of Agriculture and their extraordinary efforts on private lands through the Sage-Grouse Initiative and other voluntary incentive programs that positively affect sage-grouse conservation.

Our community generally has been pleased with your efforts on sportsmen's access issues. We are, however, becoming concerned about the Administration's stance on sage-grouse habitat conservation and management on federal lands – the sage-grouse conservation plans represent a great deal of collaboration and landscape level planning. We encourage you to maintain this effort with minor adjustments as deemed necessary and based on sound science. We appreciate you considering our input on the Secretarial Order and report recommendations and Notice of Intent to amend sage-grouse conservation plans. We look forward to continuing to work with you and your staff members and agencies as DOI moves forward with sage-grouse conservation.

Respectfully,

American Woodcock Society  
Archery Trade Association  
CampFire Club of America  
Conservation Force  
Delta Waterfowl  
Izaak Walton League of America  
Masters Foxhounds Association  
Mule Deer Foundation

National Bobwhite Conservation Initiative  
National Wildlife Federation  
National Wildlife Refuge Association  
National Wild Turkey Federation  
North American Grouse Partnership  
Orion, the Hunter's Institute  
Pheasants Forever  
Pope and Young Club  
Quail Forever  
Quality Deer Management Association  
Ruffed Grouse Society  
Theodore Roosevelt Conservation Partnership  
The Wildlife Society  
Whitetails Unlimited  
Wildlife Forever  
Wildlife Management Institute

cc: David Bernhardt, Todd Willens and Kathy Benedetto, DOI; Greg Sheehan, USFWS; Brian Steed, Mike Nedd, Johanna Munson, BLM