

February 2, 2022

BLM – Utah State Office  
Attn: Patricia Deibert  
440 W 200 S, Suite 500  
Salt Lake City, UT 84101M

Re: Docket ID DOI-BLM-WO-2300-2022-0001-RMP-EIS, Greater Sage-Grouse Land Use Plan Amendments and EISs

To Whom It May Concern:

The Missouri River Conservation Districts Council (MRCDC) is a coalition of the fifteen conservation districts along the Missouri River in Montana. Spanning 725 miles of River corridor from its headwaters in Gallatin County to Richland County at the North Dakota border, MRCDC seeks to be the united voice for conservation of the Missouri River, its tributaries, and its associated uplands. Montana is the first state in the entire 10-state Missouri River basin to organize and fund a grassroots entity focused solely on the Missouri River basin.

With over eight million acres of Bureau of Land Management land in Montana, BLM's Greater Sage-Grouse Use Plan impacts Montanans and its communities. In moving forward with the amendment process, we believe the five following items need to be considered.

**1. *Local ecological knowledge importance.***

On-the-ground, local ecological knowledge (LEK) of the land is important to incorporate into the Plan. There is a lot of information that is overlooked by research or that research is not capable of capturing. Folks who are on the ground and have the working knowledge can help fill in gaps and keep research outputs practical.

**2. *Predator impacts and control.***

Sage-grouse nest success is an important factor to survival. We, humans, can do a lot to help improve the landscape but if there is an abundance of predators, egg and chick survival may still be very limited, limiting population growth. In the study by Lockyer et al <sup>(a)</sup>, of the 71 total nests monitored, there was only a 22.4% nest survival rate. Many losses were because of depredation of the eggs and chicks. The most frequent predator was the common raven, during daylight hours. Another study, Smith et al <sup>(c)</sup>, found predators destroyed 254 of the 495 nests, however, if at least one egg hatched that

nest was classified as successful. With these couple examples showing predation as a top threat to sage-grouse population, what measures can be included in BLM's sage-grouse land use plan to decrease predation of sage-grouse nests?

**3. *Livestock grazing does not harm sage-grouse populations.***

Livestock grazing has been hypothesized as a detrimental factor to sage-grouse populations. Through recent research, this hypothesis has not been found accurate. In Smith et al <sup>(c)</sup> it specifically states, "We found little evidence for the hypothesized indirect and direct effects of livestock grazing that were the primary focus of our study."

**4. *Habitat differences between sage-grouse lands.***

It is important that management authority for the species remains in-state, rather than being regional. What works in one area for sage-grouse conservation may not work in another due to slight differences in habitat and other natural resource impacts.

**5. *Sage-grouse population is going to naturally have ebbs and flows.***

It is important to keep in mind that sage-grouse recovery is going to take time because they are a species with low reproductive rates and longer life spans. There is going to be natural ebbs and flows as shown in the 25-year study by Dahlgren et al <sup>(b)</sup>. While this article shows there are some management effects, there were major differences in the decades based on precipitation, drought, and extreme winters.

The Missouri River Conservation Districts Council thanks you for taking our comments into consideration in the scoping process of BLM's Greater Sage-Grouse Land Use Plan amendments and EISs.

Sincerely,



Laura Kiehl, Chairman  
Missouri River Conservation Districts Council

cc:

Senator John Tester  
Senator Steve Daines  
Representative Matt Rosendale  
Governor Greg Gianforte  
Montana Department of Natural Resources

- a) Lockyer, Zackary B., et al. "Greater sage-grouse nest predators in the Virginia Mountains of Northwestern Nevada." *Journal of Fish and Wildlife Management*, December 2013.
- b) Dahlgren, David K., et al. "Greater sage-grouse and range management: insights from a 25-year case study in Utah and Wyoming." *Rangeland Ecology & Management*, June 2015.
- c) Smith, Joseph T., et al. "Effects of livestock grazing on nesting sage-grouse in central Montana." Article doi: 10.1002/jwmg.21500.