October 4, 2025

BLM Anchorage District Office
Attn: Stephanie Rice
4700 BLM Rd
Anchorage, AK 99507
Submitted online via eplanning.blm.gov

**RE: Greater Sage-grouse Rangewide Planning Changes to Proposed Resource Management Plan Amendments for Idaho, Montana/Dakotas, Nevada/California, Utah, and Wyoming**

To Whom It May Concern:

The Idaho Cattle Association (ICA) submits the following comments on the Bureau of Land Management's (BLM) proposed changes to the proposed resource management plan (RMP) amendments for Idaho. The comments are provided on behalf of the cattle ranching families of Idaho who have grazing permits on BLM land and whose livelihoods are tied to the continued, viable use of that land.

For the past several years, ICA has been deeply involved in all of BLM's public processes for plan development for managing sage grouse. We continue to maintain that the management framework that BLM has in place for livestock grazing is sufficient for managing grazing in sage grouse habitat and that no additionality is needed. This was recently made even more clear through the finalization of the University of Idaho's Grouse and Grazing exhaustive ten-year research project which found that livestock grazing had no negative impact on sage grouse nest success nor is there any negative correlation between sage grouse and the presence of cattle. With this new information, we offer the following comments specific to the changes that have been proposed in this document.

**Page 21 - Updated Nesting Habitat Benchmark for Nevada/California and Idaho Proposed RMPA**

The indicator for perennial grass height has been changed to "suitable nesting cover". This is a change that we support. Heavy emphasis on vegetation height without a comprehensive explanation in the documentation of the numerous reasons for variation in vegetation height would have singled out livestock grazing as the single impact. Vegetation height is not an effective measurement for long term rangeland health. Grazing is but one of many factors influencing grass height with others including precipitation, soils and temperature. Set, pre-determined measurement standards should not be required but rather site-specific

monitoring and adaptive management to leave an appropriate amount of growth on the ground at the right point in time. Annual variations, landscape variations, the technical intricacies of measuring stubble height, and other limitations would make a specific, pre-determined standard a counterproductive way to address nesting cover.

Most importantly, the findings from the University of Idaho Grouse and Grazing study show that moderate use levels do not negatively impact sage grouse survival and success and we appreciate that this study has been referenced in Appendix 4. Nest success, brood survival, and hen recruitment remained stable across utilization and intensities observed. These findings are further reinforced by a two-year study done by the University of Idaho Rinker Rock Creek Ranch that found high intensity grazing (around 70-80% utilization) can increase cover and biomass of forbs important to sage grouse populations, indicating that properly managed grazing at higher utilization levels still does not harm grouse populations. (University of Idaho Rangeland Center. "Coexisting in Wet Meadows." *University of Idaho College of Natural Resources*.)

In the table, we recommend removing the references to the Connelly et al. 2000, 2003 and Hagen et al. 2007 research for the perennial grass indicator. These studies are outdated and more recent research has disproven their findings. Additional studies that could be referenced to reinforce these points include:
*Effects of Livestock Grazing on Nesting Sage-Grouse in central Montana, J. Smith, J. Tack, L. Berkely, M. Szczypinski, D. Naugle, 2018.*

*Evaluating vegetation effects on animal demographics: the role of plant phenology and sampling bias. D. Gibson, E. Blomberg, J. Sedinger, 2016.*

*Linking conservation actions to demography: grass height explains variation in greater sage-grouse nest survival. K. Doherty, D. Naugle, J. Tack, B. Walker, J. Graham, J. Beck, 2014.*

*Sage Grouse Habitat Requirements. University of Nevada, Reno Extension.*

*Stepping Lightly in the Sage: researchers Learn Moderate Grazing Has No Effect on sage Grouse Nest Success. University of Idaho*

*Timing of Vegetation Sampling at Greater Sage-grouse Nests, Hausleitner, Doris, K.P. Reese, and A.D. Apa. 2005.*

**Page 4 – Adaptive Management Index, Habitat Thresholds**
A concern we had with the proposed RMP was that management changes could be made to areas adjacent to where a habitat trigger had been tripped. On page 4, number 2 states:

> *If a spatial analysis unit cannot be restored to original sagebrush conditions and/or habitat function due to ecological or disturbance limitations (e.g., intense wildfire-killed soil microfauna, dense anthropogenic activities, etc.), restoration and/or habitat enhancement in adjacent spatial analysis units can be considered to increase GRSG abundance in those areas.*

This section implies, or could be interpreted, that management changes could be made to grazing in areas adjacent to those which have been impacted by fire. We maintain that it is not appropriate to make changes to grazing management to mitigate for the impacts in other areas and we request that the plan specifically state this.

**Page 7 – PHMA and IHMA Adaptive Management Responses, Exceptions to Threshold Responses**

*4. A livestock grazing permit or lease to extend the current livestock grazing practice may be renewed until the CFA is completed. If livestock grazing is not determined as a causal factor to an activated threshold, livestock grazing permit or lease renewal can proceed normally.*

*5. If livestock grazing is identified as a causal factor to an activated threshold, the terms and conditions of the livestock grazing permit or lease will need to be examined through NEPA and potentially modified to reduce or eliminate negative habitat impacts. Continuing the terms and conditions for livestock grazing when a permit or lease has expired or was terminated due to a livestock grazing preference transfer in accordance with Section 402(c)(2) of the Federal Land Policy and Management Act (FLPMA).*

In this section, we appreciate the clarification that livestock grazing must be identified as a causal factor in tripping a habitat trigger. However, we have some concerns related to this. Adequate and correct monitoring will be key to implementing this plan correctly. However, given the current limitations on BLM staff availability, combined with other regulatory actions that the BLM is undertaking, we are concerned about the ability of the agency to implement the plan accurately with regards to livestock grazing.

Monitoring of livestock grazing in the plan relies on the use of the Habitat Assessment Framework (HAF). Based on the experience of Idaho grazing permittees in the past, we know there is potential for misapplication of this tool. HAF creates a narrow focus on a specific, plot level site and extrapolates that information to the allotment level. What a specific site looks like is not an indicator of success on the allotment scale. It should not be the sole determinative factor of sage-grouse habitat quality nor of grazing impacts. HAF can be a tool to inform the data, but it should never be the only tool used to assess land condition and habitat suitability.

An additional concern with the language identified above is that it allows a livestock grazing permit to continue under <u>current</u> practices. The plan should not restrict the BLM from implementing new grazing management practices, such as timing, intensity, or implementation of range improvements, in order to achieve management objectives. It is possible, and most likely, that the current grazing permit could benefit from updates to enable better management.

**Page 7 – PHMA and IHMA Adaptive Management Responses, Inconclusive CFAs**

*If a CFA identifies no causal factor for an activated threshold, the BLM may consider additional project-level restrictions on existing or new activity authorizations within the spatial analysis unit of the activated threshold.*

The BLM should not be enabled to place additional restrictions on grazing permits or make changes to grazing management without direct evidence and process proving that grazing is a causal factor. The BLM should not make changes to grazing management with

inconclusive evidence under any circumstance. The plan should include language clarifying this point.

**Issues that are not identified in this document, but need correction**
In ICA's comments to the Greater Sage-Grouse Draft Resource Management Plan Amendment/Draft Environmental Impact Statement (Draft RMPA/EIS), dated June 13, 2024, and our protest to the 2024 Greater Sage-grouse (GSRG) Land Use Plan Amendments and Final Environmental Impact Statement, dated December 16, 2024, we stated concerns and offered clarifications to the following issues which have not been addressed in this proposed changes document, but that we continue to seek resolution to before the plan is finalized:

A. Thresholds and Responses
Chapter 2, Table 2.4, Page 2-34, RM-2
The management of grazing permits is guided by 43 CFR. In these regulations, 4180.2(c)(1) outlines the steps to be taken if rangeland is failing to achieve standards. Under the existing regulatory framework, if an area is found to not be meeting standards and grazing is determined to be the causal factor, then additional terms and conditions are developed during the permit renewal process. This process gives BLM full ability to respond to and address management concerns and make management changes if a standard is not being met. Threshold and responses allow the BLM to add additional requirements and repercussions outside of the permit process. Grazing permit requirements are established to manage the landscape as a whole over time where thresholds and responses inappropriately bring focus on small areas that are likely not representative of the health of the landscape. At a minimum, we request an accompanying Internal Memorandum, that clarifies the appropriate implementation of thresholds and responses and a more clear outline of how and when they should be applied.

B. Range Improvements
Chapter 2, Table 2.4, Page 2-34 and 2-35, RM-3, RM-4, and RM-5
The Proposed Plan establishes a position that range improvements, generally, pose an outsized risk to GSRG persistence. Productive grazing management depends on BLM compliance with the grazing regulations and the ability to develop range improvements that support reasonable and responsible land use management. Prohibition of new range improvements, recommendations to remove range improvements, or consideration of range improvements as primary threats are not supported by science. Further, assessment of range improvements and their distance requirements from leks should not be prescribed at this programmatic level but rather conducted through a site specific NEPA process. Rangeland improvement projects are important tools for grazing permittees and the BLM to manage grazing at optimal levels. Implementation of the Proposed Plan should not result in the reduction or elimination of range improvements, nor should the plan discourage their development. The Plan should be modified to state that that range improvements are within the suite of actions to be considered to achieve applicable Standards and Objective, as is already prescribed in 43 C.F.R. 4180.2(c).

C. Permit Retirement/Relinquishment
Chapter 2, Table 2.4, Page 2-35, RM-6

We oppose retiring grazing permits and converting permits into forage reserves or grass banks as a proxy for GSRG conservation. Equally, we oppose the same actions as a proxy for mitigation of other activities related to GRSG management. As noted repeatedly in Chapters 2 and 4, removal of grazing from the landscape increases the risk of fine fuels buildup on the landscape which increases the risk of catastrophic wildfire, which has knock-on effects for plant biodiversity, predation, encroachment of invasives, and long-term lek selection. Any permits relinquished as a matter of business administration should undergo immediate evaluation for reissuance, as a single permittee's decision should not remove the allotment(s) from productive use.

We also oppose the default position that any relinquished preference should be considered as a reserve common allotment for use on a temporary basis. Layering of requirements that relinquished permits, or preference will not immediately be analyzed for reissuance, coupled with the agency's historical unwillingness to utilize tools like temporary non-renewable (TNR) permits, will result in fewer active allotments and increased persistence of hazardous fuel loading.

The Proposed Plan presupposes authority to relinquish or retire grazing permits within a designated Grazing District. The USDI-Solicitor Memorandum dated May 13, 2003, clarified M-37008, in relation to retiring grazing permits. See https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/M-37008.pdf. This Memorandum speaks for itself but confirmed that:
"[a]ny decision to retire livestock grazing on federal lands is not permanent, unless made permanent through congressional action. Any such decision is subject to reconsideration and reversal during subsequent land use planning."

Thank you for providing the opportunity to submit these comments. We hope that you will incorporate our ideas and address our concerns into the final RMP/EIS. Please do not hesitate to contact us, by sending an email to karen@idahocattle.org if you need further information or have questions about these issues.

Sincerely,

Spencer Black, President
Idaho Cattle Association