

April 22, 2010

Interior Secretary Ken Salazar  
Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240

Dear Secretary Salazar,

Western Counties Alliance is a coalition of rural western counties that focuses on the impact of federal land management policies on public lands counties and residents. Like other stakeholders, we are very concerned about declining sage grouse numbers that have led to its recent designation as a candidate species for listing under the Endangered Species Act. We are particularly concerned about the impact this action would have on multiple use management of the public lands and resources.

We commend you for emphasizing cooperation with a number of entities, including livestock producers, in your efforts to recover sage grouse populations. By looking for “smart ways to protect habitat” we think you have the right objective in mind. Unfortunately, we think that it has very little chance of success unless there is a significant shift in the current federal approach to trying to recover the sage grouse on the public lands.

There is ample evidence to support our assessment. The logical first step in recovering the sage grouse is to determine what has caused its comparatively rapid decline over much of its range. The second is to take action to remove or mitigate those causes. This must be done while keeping in mind the recent history of sage grouse populations. As recently as fifty years ago sage grouse were “as common as Jackrabbits” across much of the West, as one account colorfully put it. Yet, over the intervening years their numbers have steadily declined to the point of imminent listing today. The reasons commonly cited for this decline, such as excessive livestock grazing, oil and gas and other natural resource development activities, conversion of sagebrush steppe habitat to housing and other uses all no doubt explain some of the decline in a few local areas. However, even a cursory review of what is happening on the ground over most of its range quickly reveals such explanations as too simplistic. For example, they do not explain why the bird is declining over vast areas of its range where none of these supposed causes of its decline are present. They also ignore an important element in the historical record.

At the same time when sage grouse were far more abundant historic stocking rates of livestock on sagebrush steppe grazing allotments were considerably higher than they are today. This would logically lead to the conclusion that livestock grazing is not a significant factor in the species decline--if it is a factor at all—at least at these historic stocking rates. Other disturbances, such as oil and gas development were also occurring during this time of abundance and with comparatively less environmental regulation. Fire policies then were very different, much less integrated and the resources for fire fighting were less available than they are today, to cite another example of an important difference.

However, probably the most important historic factor to recognize is that back at the time of greater abundance federal land management policy and philosophy were very different than today. At that time they emphasized appropriate water availability and implementation of scientific allotment management plans to control overgrazing and improve grazing resources for wildlife and livestock. It is different today. In contrast, current policy focuses primarily on simply reducing livestock numbers, largely for ideological rather than valid scientific reasons. It largely ignores plant community dynamics, such as over mature, fire prone sagebrush stands which have out competed grasses and forbs and progressively destroy sage grouse habitat values.

This logically leads to asking the question whether this change in federal grazing and land management policies could be at least partly responsible for the species decline. That question is all the more pertinent because the decline in sage grouse numbers on public lands can be closely correlated with this change in federal management philosophy and the resulting impact on sagebrush steppe habitat have become more pronounced.

It is our contention that, in fact, current federal grazing and land management policies are the major cause of the decline in sage grouse populations. We recognize that this is a strong indictment but, again, there is strong evidence to prove it.

The strongest evidence is that sage grouse are still flourishing in some parts of their range. Deseret Ranch is a good example. This is a very profitable commercial cattle ranch located in Rich County, Utah. The county is approximately 50% federally-managed land and it is one of the places where Sage Grouse were abundant fifty years ago. In the years since, sage grouse numbers have declined precipitously but not uniformly in the county. Deseret Ranch is one of the exceptions. In size, it represents about 1% of the current and potential Sage Grouse habitat in Utah (depending on how that is defined) but at least 20% of all sage grouse in the state of Utah live on this one ranch. Repeated surveys have shown that there are approximately 10 sage grouse on Deseret Ranch for every one found in a comparable area of the adjacent BLM-managed lands. Nor is Deseret Ranch an isolated example. Similar results are found on other scientifically-managed private rangelands across the West. Any successful federal effort to recover the sage grouse must determine why that is the case and make whatever adjustments are necessary to replicate it on the public land.

Aside from the obvious fact that the habitat for sage grouse on these private land holdings is not subject to current federal management policies, these private rangelands share a number of other common characteristics. Not surprisingly, one is that on a broad range of other environmental indicators they are in far better condition than the federal lands on the other side of the fence lines. These privately managed lands have greater biodiversity, more wildlife and better wildlife habitat, less soil erosion, healthier watersheds, better water retention and utilization efficiency, greater drought tolerance, higher forage production and others. They are in much better condition than the adjacent federal lands because they are being managed based on sound science and in a way that requires producing a range of measurable benefits.

Obviously, the sage grouse are benefiting from this management approach. They have larger brood sizes and higher survival rates. In contrast, because the adjacent federal land is being managed in a way that is largely unsupportable by sound science and largely ideologically-driven, it is obviously not producing conditions conducive to sage grouse survival.

The real key to understanding the difference is to recognize that it is the use of livestock grazing as a tool of habitat management on these private rangelands that is generating these beneficial conditions. Grazing on these private lands is conducted to improve forage quality and quantity and in the process it optimizes habitat values and wildlife survival rates, including for sage grouse. This management approach is in stark contrast to the management regime on the adjacent federal lands that is primarily focused on merely limiting disturbance by livestock.

Sage grouse are thriving under this grazing management system because they are a “disturbance-dependent species.” They are dependent on certain types of disturbances of their habitat to flourish, including the maintenance of an optimum range of overstory cover, proper forbs and insects available for successful nesting and brood rearing and so on. Properly managed livestock grazing obviously can provide these while generating substantial revenue at the same time. Not only can livestock impacts provide these benefits more effectively than other methods but also more cheaply than any of the alternative approaches often suggested, including many of those that are incorporated in government recovery plans. Livestock also produce more of the associated environmental benefits found on these privately managed ranges than these other approaches which ignore the ecosystem services only animals can provide.

This history and the reality of the disparity in sage grouse numbers raises an obvious question. If the objective is to recover sage grouse, why does the federal government not employ on federal rangelands the simple, cost effective and widely beneficial management techniques that are proven so successful on adjacent private rangelands? In view of the requirements of the Endangered Species Act for use of the best information available, the American people who own these lands and resources can legitimately ask this question of you as their current steward. We think that you owe them a clear answer.

Since there is extensive livestock grazing occurring on federal lands, it obviously is not the absence of grazing that accounts for this disparity in sage grouse numbers. Rather, as we have stressed, it is the ideological focus of federal grazing management policies, and to a very significant extent other policies related to rangeland fire, predator control and noxious weed control that are the problem. It also is important to understand that innovative grazing demonstration projects have been done on federal lands within federal policy and legal constraints. The necessary flexibility clearly exists if there is the commitment and the will to accomplish beneficial goals.

It is this last component, the mindset of too many federal land managers that is the real problem. For many livestock grazing is primarily an ideological issue. They “know” that domestic livestock are “unnatural and bad for the land” and are therefore hostile to livestock grazing even though it is provided for in law and regulation. Other federal managers have understandably but unwittingly been misled by research that, because of its narrow focus is, to put it bluntly, simply wrong or not applicable in the real world. It is not necessary here to examine the reasons for this situation, merely to note that it exists. Again, one need look no further for proof of this conclusion than the dramatic fence-line contrasts that demonstrate even to untrained individuals the difference between current federal management policies and those on adjacent private land.

Our objective is not to focus on the causes of the problem except as it is necessary to understand them to correct it. We are proposing a simple way to cut through any such debate and clearly demonstrate the validity of our contention that federal management policy is largely responsible for the decline of the sage grouse (as well as creating many other problems in the West). That is, simply, to apply these range management and grazing techniques that have been clearly shown to be so successful on privately managed rangeland in a number of landscape scale demonstration projects on federal rangelands and honestly evaluate the results. We think this could be done at little or no additional cost to the taxpayer, since these demonstrations would be on existing grazing allotments where the essential input, livestock grazing, is already available. And, while some of the techniques are not commonly being practiced under current federal grazing and other management policies and philosophy, they clearly are not harmful to the range. To reassure any possible skeptics that this is in fact the case, we propose that an independent monitoring team be organized for each demonstration project that would augment the agency personnel who already monitor grazing on that allotment.

We propose that these demonstrations be run for a minimum of five years and preferably ten. At the end of that time, if we are able to use the techniques already demonstrated to be successful on private rangeland, we can assure you that there will be clear positive sage grouse population trend indicators and there will be measurable benefits in a number of related areas as well.

One of those additional benefits from conducting these demonstrations would be the opportunity to simultaneously evaluate the use of public rangelands for atmospheric carbon sequestration. Several weeks ago we copied you on a letter we sent to President Obama suggesting that incorporating new research expanding our understanding of how

carbon is sequestered in grassland soils with the same kind of range management techniques that would be employed on these sage grouse recovery demonstration projects, could also demonstrate that they are the best, cheapest and most immediately available “carbon sink” available for atmospheric carbon sequestration. For your convenience, I am attaching another copy of that letter to the president. The proposed sage grouse recovery demonstration projects we are suggesting could simultaneously provide an ideal opportunity to evaluate the potential of this strategy in a number of different locations and conditions.

We would like to discuss this with you personally or with any one you would designate to follow up on setting up demonstration projects to recover the sage grouse on public land.

We look forward to hearing from you.

Sincerely,

Mark O. Walsh  
Executive Director

Attachment