

January 5, 2018

John Shivik
USDA Forest Service Intermountain Region
Federal Building
324 25th St.
Ogden, UT 84401

Submitted via email to johnashivik@fs.fed.us

CC: Tricia O'Connor and Kerry Murphy, Bridger Teton National Forest

RE: Sage-grouse Land Management Plan Amendment Comment

Dear Mr. Shivik,

Thank you for the opportunity to comment on the Forest Service Notice of Intent to review and possibly amend the 2015 Sage-grouse Land Management Plan (Sage-grouse plan) that was collaboratively developed across Wyoming.

The Jackson Hole Conservation Alliance (Alliance) represents over 2,000 constituents in Teton County, WY and works to protect the wildlife, wild places, and community character of Jackson Hole. We envision healthy and sustainable wildlife populations with protected wildlife habitat. We strive to ensure that wildlife and their habitat are managed by our agency experts based on science, facts, and data without political interference. For sage-grouse and their sagebrush habitat, we support conservation efforts that focus on maintaining, protecting, and restoring priority habitats that lead to resilient, robust populations.

As you revisit the plan, we hope that you will consider the following:

The plan was developed through an unprecedented collaborative process and achieved broad support.

The Sage-grouse plan was the result of an innovative collaborative process that brought together stakeholders from energy, agriculture, mining, electrical utility companies, conservationists, and resource management agencies. The plan that resulted from this effort has broad local support and sufficiently balances protection with economic development. This management strategy should be celebrated as a success story for collaborative, locally-driven conservation.

Sage-grouse are best protected through habitat protection and management, with a focus on core areas.

In our forthcoming *State of Wildlife in Jackson Hole* report that evaluates the threats to wildlife within the Jackson Hole valley, high-altitude sagebrush and grasslands were found to be one of the most critical habitats for the iconic wildlife that roams this

landscape. The sagebrush steppe defines the valley not only in appearance, with verdant hillsides providing the foreground to commanding mountain skylines, but also provides valuable habitat for a number of species of birds and ungulates; in total, 350 species rely on the sagebrush ecosystem. In Teton County alone, it is estimated that we have lost approximately 45% of our historic sage-grouse population and face the possibility of future decline of the population. We must reverse that trend if sage-grouse are to survive and recover.

Studies have suggested that population-based management targets with captive breeding programs will be unsuccessful in maintaining a viable sage-grouse population. Sage-grouse reared in captivity lack necessary behaviors, such as predator avoidance and successful foraging abilities, that lead to their death shortly after release into the wild. An attempt to manage sage-grouse through a captive breeding program could put the population at an additional risk and direct valuable resources away from habitat protection. Instead of changing course, we support keeping the focus on habitat protection to protect sage-grouse.

A strength of the 2015 plan is its recognition that management may need to change as new science becomes available in years to come. We recognize the role adaptive management will play in keeping this plan relevant, but believe that changes to the plan should be based in science and should not involve wholesale amendments.

Overall, we hope that you consider these comments as you go forth with the review and amendment process. Thank you for your efforts in conserving and protecting the National Forests throughout the West.

Sincerely,

Leah Zamesnik
Conservation Policy Manager