



Flathead Audubon Society

PO Box 9173
Kalispell, MT 59904

Montana Greater Sage-grouse Habitat Conservation Advisory Council December 3, 2013

Dear Sirs:

The Flathead Audubon Society has reviewed the Draft Greater Sage-Grouse Habitat Conservation Strategy and provides our comments in this letter.

We are encouraged by the Governor's initiative to begin this effort for conserving sage-grouse in Montana. The Draft Strategy contains several strengths and also other points of concern that should be addressed or changed.

Good points of the Draft Strategy include: 1 mile No Surface Occupancy within Core Areas; 5% maximum disturbance in a project area; seasonal, timing, noise, and distance requirements in Core Areas; maximum 1 well pad/640 acres; no wind energy developments within 4 miles in either Core Areas or General Habitat; conservation fund being set up by the Governor; and direction to all state agencies to comply with the Strategy.

Points of concern that should be changed or addressed are discussed in the following paragraphs.

Since Core Areas are the primary basis for sage-grouse conservation in the Strategy, each Core Area needs to be assessed for habitat conditions and populations. A statewide population estimate does not provide sufficient information to determine how individual Core Areas are meeting the conservation needs. Individual Core Area health assessments would provide a baseline to judge how the conservation strategy is working and to evaluate proposed activities. A population goal for the entire state may be desirable but is much less useful and meaningful than an assessment of habitat and population for each Core Area.

Because Core Areas are critical to the Strategy, there should be an established system to periodically review the boundaries, perhaps every 5 years and this should be conducted by qualified biologists. Also, there should be criteria spelled out on how and why boundary changes could be made.

Special Management Core Areas should be reduced in size to include only those areas currently active for oil and gas development or mining. This is especially true for the bentonite mining areas. If those activities want to re-classify an area as a Special Management Core Area, they can use the petition process set up in the Draft Strategy.

In the General Habitat Area, the No Surface Occupancy within ¼ mile of leks is not science-based and current science indicates that it will not protect leks. Given that the Core Areas only encompass about 76% of existing sage grouse habitat, it would be prudent to provide more protection to existing leks in the General Habitat Area.

Section VI STIPULATIONS FOR DEVELOPMENT on page 13 states that permitting agencies, including the BLM, would be required to follow the Plan and its stipulations. However, the BLM is not bound by state direction and the various BLM offices have already developed or are currently developing their own sage grouse conservation plans that do not necessarily follow the stipulations contained in this proposed plan.

The discussion and emphasis on wildfire is overkill. More space and detail is provided for this issue than any other yet other issues are equally or more important to conserving sage grouse.

In the Predators section of Management Recommendation, what does part 'h.' on page 37 mean? What kind of help, what kind of small mammal control, what species, how extensive with the control be, and what is the need for it based on? More details are needed to allow for reasoned comments. In addition, because sage grouse are a prey species, it may be tempting for the Council to recommend increasing predator control in sage grouse habitats. However, experience shows that predator control is expensive, yet has very little long-term conservation value. Therefore, we do not want the Council to increase predator control recommendations in the Draft Strategy—the precious funds that will be dedicated in Montana for sage grouse conservation need to be used on more effective strategies.

There appears to be an inconsistency relating to the calculation of anthropogenic disturbances as relating to the 5% maximum surface disturbance allowed within a project area. On page 14 under 2a it states that the calculation of total disturbance will include “all existing disturbance (anthropogenic)” but on page 28 under Exempt Activities many existing uses are listed that may produce unsuitable sage grouse habitat such as existing farming for grain crops or livestock grazing that does not meet rangeland health standards. The Wyoming Density and Disturbance Calculation Tool provided in Appendix E also describes existing disturbance as “sage-grouse habitat that is disturbed due to existing anthropogenic activity...” All existing disturbances that impact sage-grouse habitat or populations should be included in the 5% maximum calculation to get a true picture of the existing status of habitat before allowing further disturbances.

Thank you for considering our comments.

Bob Lopp, President
Flathead Audubon Society