



MONTANA  
TELECOMMUNICATIONS  
ASSOCIATION

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Submitted via BLM Web Site

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Re: Request for Comment on the Bureau of Land Management Notice of Intent To Amend Land Use Plans Regarding Greater Sage-Grouse Conservation and Prepare Associated Environmental Impact Statements; *86 Fed. Reg.* 66331 (November 22, 2021)

Dear Ms. Deibert:

The Montana Telecommunications Association (MTA) respectfully submits these comments in response to the Bureau of Land Management's November 22, 2021, Notice of Intent to Amend Land Use Plans Regarding Greater Sage-Grouse.

MTA is the trade association for Montana's rural broadband cooperatives and companies. Our members deploy a considerable amount of broadband infrastructure in areas of Montana that contain sage grouse habitat. Any projects in these habitats are subject to procedures we already effectively implement and abide by.

Due to the Montana Sage Grouse Habitat Conservation Program and the Sage Grouse Stewardship Act passed in 2015, sage grouse preservation in Montana has been and continues to be highly successful. The Montana Sage Grouse Oversight Team approved two mitigation documents on October 4, 2018, for more detailed information:

[Policy Guidance Document \(v1 October 2018\)](#)

[Habitat Quantification Tool Technical Manual \(v1 October 2018\)](#)

Montana's plan works in conjunction with the BLM Land Management Plan implemented in 2015 under the Obama Administration and has not changed since due to its success. According to the Montana Sage Grouse Habitat Conservation Program, Montana and other western states' commitment to sage grouse preservation led to the US Fish and Wildlife Service not listing the sage grouse as endangered ([Quick Facts: Montana Sage Grouse Habitat Conservation Program](#)). The Bureau of Land Management's plan in Montana is working and working well, so we encourage you not to change it. Change will be costly and disruptive.

After a few years of implementation of Montana's current program, Jodi Bush of the US Fish & Wildlife Service commented at an October 2021 listening session hosted by the Montana Sage Group Oversight Team,

“...we continue to express our continue strong support for the Program and for the effective implementation of the Stewardship Act and of those Executive Orders. Because of the substantive, positive impact that’s had on Montana greater sage grouse conservation. And as you’ve heard today, this has been achieved in no small part through thoughtful and transparent program implementation and ongoing stakeholder engagement regarding the Program and through improvements... Montana is one of the few states that has seen its sage grouse numbers be relatively unimpacted over the last several years and your program is an example for other states working on sage grouse conservation. And then lastly, I just wanted to say, you know, Montana has the second largest greater sage grouse population in the 11-state range. Regulatory mechanisms as the Program here and effective implementation of the Executive Orders and the Act were key to our not warranted finding in 2015 and would be key looking at a review of the status of the sage grouse in the future.”

The US Secretary of Agriculture issued a [Memorandum](#) in June of 2020 directing the Chief of the Forest Service to “expedite broadband development on Forest Service lands to increase internet connectivity in rural America.” In President Biden’s [Fact Sheet](#) for the American Jobs Plan he specifically lists, “**Build high-speed broadband infrastructure to reach 100 percent coverage.** The President’s plan prioritizes building “future proof” broadband infrastructure in unserved and underserved areas so that we finally reach 100 percent high-speed broadband coverage.”

It has become increasingly clear, especially post-pandemic, that broadband is as an essential service. Many rural Americans do not have access to broadband or have subpar internet service that cannot meet their needs to access such items such as education, commerce, and healthcare. If significant changes in the land use plans are made, it could restrict the ability of our members to deploy broadband in unserved and underserved areas in rural Montana.

Montana and other states are preparing to receive billions of American Rescue Plan Act of 2021 (ARPA) and Infrastructure Investment and Jobs Act (IIJA) funds to deploy broadband to the unserved and underserved in our rural communities. As they always have, our members will continue to follow strict land use plans when projects cross sage grouse habitat. Any additional regulation or changes could prevent or delay essential broadband services to rural citizens.

Given these concerns, we urge the BLM not to change Montana’s Sage Grouse Land Use Plan.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to be 'G. Feiss', written in a cursive style.

Geoff Feiss, General Manager  
Montana Telecommunications Association