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June 21, 2011

Deputy Director Dan Ashe
U.S. Fish and Wildlife Service
Department of the Interior
1849 C Street NW
Washington, DC 20240

Director Robert Abbey
Bureau of Land Management
U.S. Department of the Interior
1849 C Street NW, Room 5665
Washington, DC 20240

Director David White
Natural Resources Conservation Service
14th and Independence Avenue, SW, Room 5105-S
Washington, DC 20250

Dear Director Ashe, Abbey and White:

On behalf of Director Tom Remington, Colorado, Director Virgil Moore, Idaho and Deputy Director John Emmerich, Wyoming and myself, I want to take this opportunity to thank you for hosting our interagency meeting on the listing of the Greater sage-grouse. Our assessment of the meeting was that it was a success! Our goal was to have a frank discussion about the gravity of the situation if the bird receives the full protection of the Endangered Species Act (Act) and the steps we all need to take to prevent this.

Because the Greater sage-grouse was determined to be warranted for listing based largely on two listing factors identified in the Act (the present or threatened destruction, modification or curtailment of its habitat, and the inadequacy of existing regulatory mechanisms) it is clear to us what needs to occur. The USFWS has stated several times, that either factor by itself can result in a warranted listing determination.

Considering this fact, it is clear that there needs to be a long-term habitat solution that both Federal agencies and state wildlife agencies must work together to address. Fortunately, there is a lot of work being done in this arena, we just need to maintain or increase the level of funding and continue to actively work on habitat issues. Thanks to Chief White for the financial support from Natural Resources Conservation Service, as we are making significant progress on the habitat front. However, habitat restoration takes time and our experiences have told us this effort may take decades to realize the full benefits.

In the short term, affecting change to the regulatory mechanisms that govern habitat impacts is crucial to addressing the other major listing factors that led to the listing decision. Hence, we believe that a well crafted "regional" regulatory mechanism is essential to providing the necessary assurances to address the essential habitat requirements for long-term habitat protection for the sage-grouse. At a minimum, these would be revisions and amendments at the level of the Western Association of Fish and Wildlife Agencies (WAFWA) Sage-grouse Management Zones, which were identified on the basis of their ecological and biological attributes, and commonality of threats to the species. Because, the BLM administers over 50 percent of the estimated sage-grouse habitat across its range, a large share of this responsibility falls on its shoulders. Thus, BLM must lead the way in reducing the major threats on their lands by developing a "range-wide" programmatic EIS or some other regional approach to these regulatory mechanisms. Because Greater sage-grouse are a landscape scale species, requiring thousands of acres to meet their annual seasonal requirements, our work must be approached at a similar scale. We are convinced that a piecemeal approach will not provide the necessary protection.

During our meeting we also discussed what needs to be done during the time while the range-wide plan amendments are being prepared. It is critical that while regulatory mechanisms are being addressed through the revisions of Resource Management Plans (RMP's), it is very important that activities on the ground currently being reviewed, prior to amending RMPs, not result in a cumulative loss or further fragmentation of habitat. This will only further harm the species and move it towards full listing. The BLM must ensure that the status of the species does not continue to decline such that new regulatory mechanisms developed and implemented over the next few years will be too late to benefit the species.

Specifically, we encourage continued attention and efforts in wildland fire suppression, as this was identified as the primary habitat concern within much of the Great Basin area. Continuing this effort is essential to long-term conservation of the bird. Additionally, we encourage the use of strong Instructional Memorandums (IMs) (similar to the one regarding fire suppression) to use as a temporary measure to ensure current activities are considered in light of sage-grouse conservation and listing. Using IMs on an interim basis as guidance throughout the sage grouse range are essential until the RMP's can be amended or revised.

As we discussed at our meeting, time is of the essence because a final listing determination for the Greater sage-grouse will be made by USFWS at the end of Fiscal Year 2015. Thus, we strongly urge the BLM to move quickly and determine a course of action in developing adequate regulatory mechanisms for the conservation of the Greater sage-grouse. We appreciate everyone's consideration and commitment to the conservation of this species. I'm sure that everyone will agree that communication will be essential to accomplish this. Thus, we request a commitment from all the agencies involved that all employees understand the importance of the conservation of sage-grouse and the steps we as the leaders of our respective agencies have chosen to conserve the bird and its habitat. From our conversations it was clear that such clear direction will be essential to us achieving our goal.

The WAFWA states will continue to be available to help you in any way we can. We appreciate everyone's efforts to improve the status of sage-grouse so as to preclude the need to list, and particularly want to thank the BLM for their stated commitment to an expedited programmatic EIS. Again, thank you for taking time out of your busy schedule to meet on this important subject and we look forward to hearing about progress and plans at the Greater Sage-Grouse Executive Oversight Committee meeting at the WAFWA summer Annual Meeting July 16, 2011.

Sincerely,

Kenneth E. Mayer

Kenneth E. Mayer
Acting Director

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cc: Acting USFWS Service Director Rowan Gould; BLM Deputy Director of Operations Mike Pool; Madeline West, Western Governors' Association; Ryan McGinness, Director Nevada's Washington D.C. Office; Noreen Walsh, USFWS Deputy Regional Director Mountain Prairie Region; Dwight Fielder, BLM Division Chief; Director Tom Remington, Colorado Division of Wildlife; Director Virgil Moore, Idaho Department of Fish and Game; Deputy Director John Emmerich, Wyoming Fish and Game