MATTHEW H. MEAD
GOVERNOR

THE STATE OF WYOMING

STATE CAPITOL
CHEYENNE, WY 82002

Office of the Governor

November 20, 2014

Dan Ashe, Director
U.S. Fish and Wildlife Service
U.S. Department of the Interior
1849 C Street NW, Room 3331
Washington, D.C. 20240-0001

Dear Director Ashe,

Thank you for sharing your thoughts about the effectiveness of Wyoming's plan for Greater Sage-Grouse conservation. Based on discussions with your agency, the Bureau of Land Management (BLM), and the United States Forest Service (USFS), I have reviewed your October 27, 2014 memorandum (Greater Sage-Grouse: Additional Recommendations to Refine Land Use Allocations in Highly Important Landscapes) and Wyoming's strategy.

Wyoming's management strategy provides that all Wyoming core areas are managed to only one activity per 640 acres and a maximum five percent average surface disturbance from all sources. The standards along with the suite of protections afforded in Wyoming's strategy (proposed for inclusion in BLM and USFS land and resource management plans) represent a conservative level of human activity. Continuing research shows those levels cause no harm to the species.

Wyoming's strategy has been cross-checked against conservation measures recommended by respected groups (the Sage-Grouse National Technical Team, the Conservation Objectives Team (COT), and other analyst scorecards). Wyoming's strategy meets or exceeds those recommendations. In fact, many of those reports use the Wyoming Greater Sage-Grouse Core Area Protection plan as their foundation

Your memorandum identifies Wyoming habitat areas of highest priority. These areas (with limited exceptions) overlay existing core population areas in Wyoming. These areas represent more than seven million acres – approximately half of Wyoming's core area habitat. I am concerned that the United States Fish and Wildlife Service (USFWS) may propose additional layered stipulations for these areas. Wyoming's Greater Sage-Grouse Core Area Protection strategy is embodied in Executive Orders 2011-5 and 2013-3 and represents our long-standing commitment to Sage-Grouse conservation across the state. Establishing different restrictions (based on land ownership in the areas depicted on the USFWS map) could jeopardize the multiple protections in place for the entire 15 million acres of core area habitat. Further restrictions on federal lands have the potential to create islands. These lands are currently

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managed primarily for Greater Sage-Grouse without regard to public or private ownership. If greater restrictions on public land direct development to private land, Wyoming loses the flexibility to manage habitat in a manner best for the bird.

Areas of Critical Environmental Concern, wilderness areas, wilderness study areas, critical habitat designations, conservation easements, historic and cultural withdrawals, Wyoming's Sage-Grouse strategy and the BLM/USFS proposed adoption of Wyoming's plan use restrictions provide substantial protections and are in place. Wyoming has analyzed the areas in your memorandum. I have enclosed this analysis showing that the restrictions currently in place provide assurance that threats to Greater Sage-Grouse in the areas have been ameliorated to the extent possible.

I understand USFWS's desire to identify and manage potential threats to the species. However, I believe the actions suggested will have negative consequences to Greater Sage-Grouse and future conservation efforts. Wyoming and its partners, including your agency, have developed unprecedented conservation measures for the Greater Sage-Grouse – a landscape-scale species of concern. These efforts are based on the best science. We are managing our landscape to increase the quantity and quality of habitat. There are strict controls on quantified threats to Greater Sage-Grouse. There is cooperation and support from those being regulated. The designation of "super-core" areas or other layered restrictions will challenge and erode the partnerships built over the past eight years. It is a mistake to sacrifice this great collaborative effort to meet an academic exercise in mapping.

I hope we can find common sense solutions that will make a difference for the Greater Sage-Grouse. Wyoming has shown a long-term commitment and remains committed to this mission.

Thank you for giving us the opportunity to re-analyze our strategy. I believe this information and mechanisms in Wyoming's Greater Sage-Grouse Core Area Protection strategy will address your concerns. I look forward to working with you. Please contact me with questions or concerns.

Sincerely,

Matthew H. Mead
Governor

MHM:mdm

Enclosures

cc: Don Simpson, State Director, BLM Wyoming
Mark Sattelberg, Field Supervisor, Wyoming Ecological Services, USFWS
Nora Rasure, Regional Forester, Region 4, USFS
Dan Jirón, Regional Forester, Region 2, USFS

Total BLM Core Acreage: 7,769,740

Identified Areas of Greater Sage Grouse Highly Important Landscapes (Acreages)

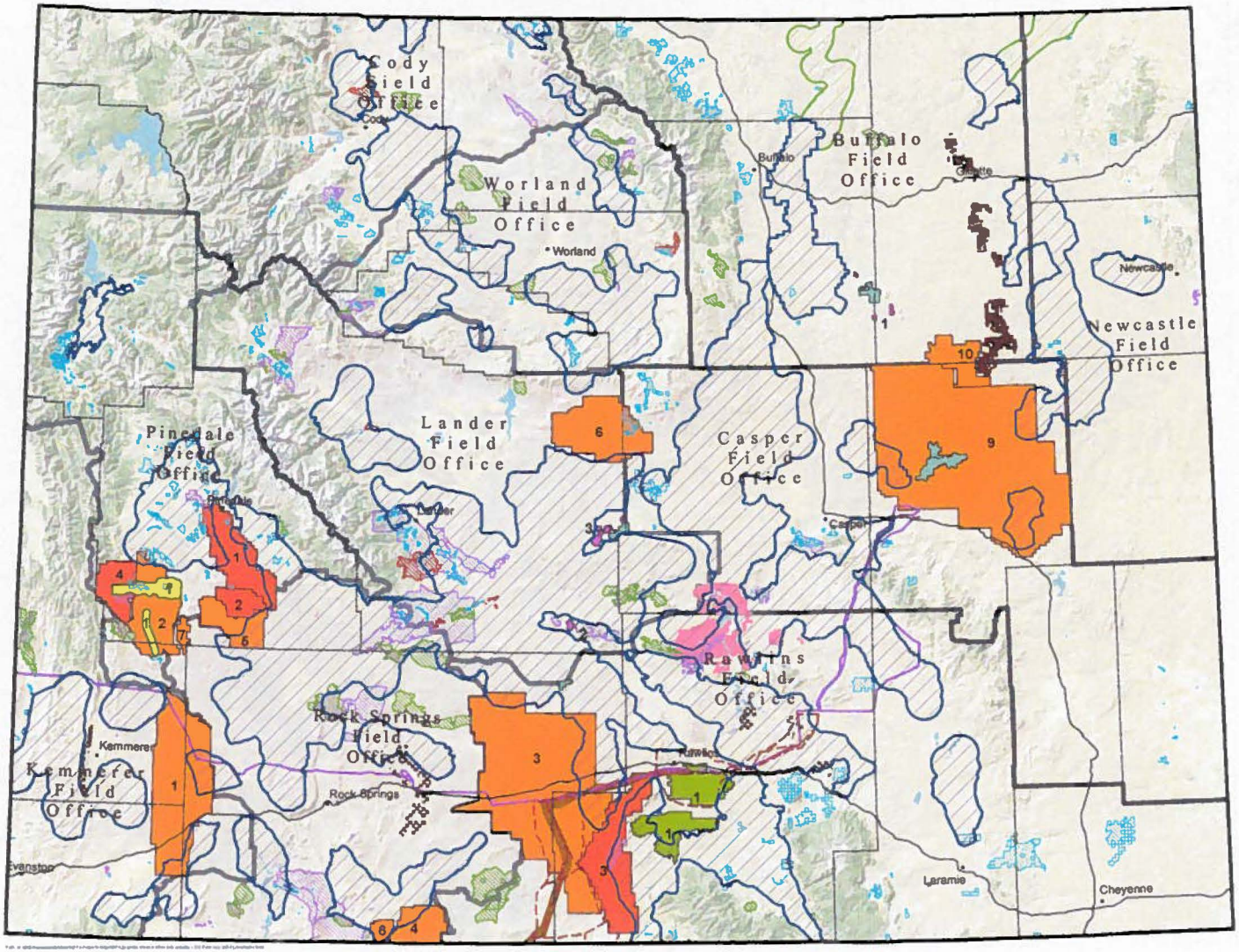
Category	Acreage	%
Total Area of Focus Areas	3,712,855	100%
Surface Ownership		
Bureau of Land Management	3,359,798	90% of Highly Important Landscape
Bureau of Reclamation	59,794	2% of Highly Important Landscape
Fish & Wildlife Service	23,095	<1% of Highly Important Landscape
Forest Service	2,752	<1% ofHighly Important Landscape
National Park Service	8,298	<1% of Highly Important Landscape
Private	109,244	3% of Highly Important Landscape
State	144,413	4% of Highly Important Landscape
Wyoming Game & Fish Department	633	<1% of Highly Important Landscape
Federal Mineral Estate	3,446,243	
Oil & Gas Leasing	3,436,954	
Closed to Leasing	563,731	16% of Highly Important Landscape
No Surface Occupancy	1,043,110	31% of Highly Important Landscape
All CSU, TLS, Disturbance Cap	1,830,113	53% of Highly Important Landscape
Open to Leasing	0	
Locatable Minerals	3,432,494	
Existing Withdrawals	815,636	24% of Highly Important Landscape
Recommended for Withdrawal	320,060	9% of Highly Important Landscape
Open to Mineral Entry*	2,296,798	67% of Highly Important Landscape
Non-Energy Leasable Minerals	3,436,313	
Closed to Leasing	1,193,995	38% of Highly Important Landscape
Open to Leasing*	2,242,318	62% of Highly Important Landscape
Mineral Material Disposals	3,435,369	
Closed to Min Mat Disposal	905,387	30% of Highly Important Landscape
Open to Min Mat Disposal*	2,529,982	70% of Highly Important Landscape
Areas of Critical Environmental Concern	258,844	
Wilderness Study Areas	81,123	
Designated Wilderness	0	
Conservation Easements	5658	
Private Nature Preserves	11,551	
Pathfinder Ranch Proposed Easement	22,288	

* - Subject to Disturbance Caps

** - within designated Right of Way Corridors

ACEC+WSA+Easements/Reserves = 379,464 acres (10%)

BLM Wyoming Major Projects November 2014



Field Office Boundary
County Boundary
Sage Grouse Core Area
Sage Grouse Connectivity Area
Wilderness Study Areas
Areas of Critical Environmental Concern
Conservation Easements
Nature Preserves (The Nature Conservancy)
Pathfinder Ranch
Active Uranium Mine
Active Coal Leases

Transmission Line Projects

Energy Gateway South (EGS)
Gateway West Approved Route
Transwest Express Preferred Corridor

NEPA Projects

Proposed O&G Development Projects

1 Blacks Fork
2 LaBarge Platform Exploration and Development
3 Continental Divide-Creston Natural Gas
4 Hiawatha Field
5 Normally-Pressured Lance Natural Gas
6 Moneta Divide Natural Gas and Oil Development
7 Bird Canyon Field Infill
8 Horseshoe Basin Unit
9 Converse County Oil and Gas
10 Greater Crossbow

Approved O&G Development Projects

1 Pinedale Anticline
2 Jonah
3 Atlantic Rim
4 Riley Ridge

Approved Wind Energy Projects

1 Chokecherry/Sierra Madre Wind Farm

Helium Projects

1 Rands Butte

Uranium Projects

1 Nichols Ranch/Hank Unit Uranium ISR
2 Sheep Mountain Uranium
3 Lower Gas Hills Conventional Uranium

Date: 11/19/2014

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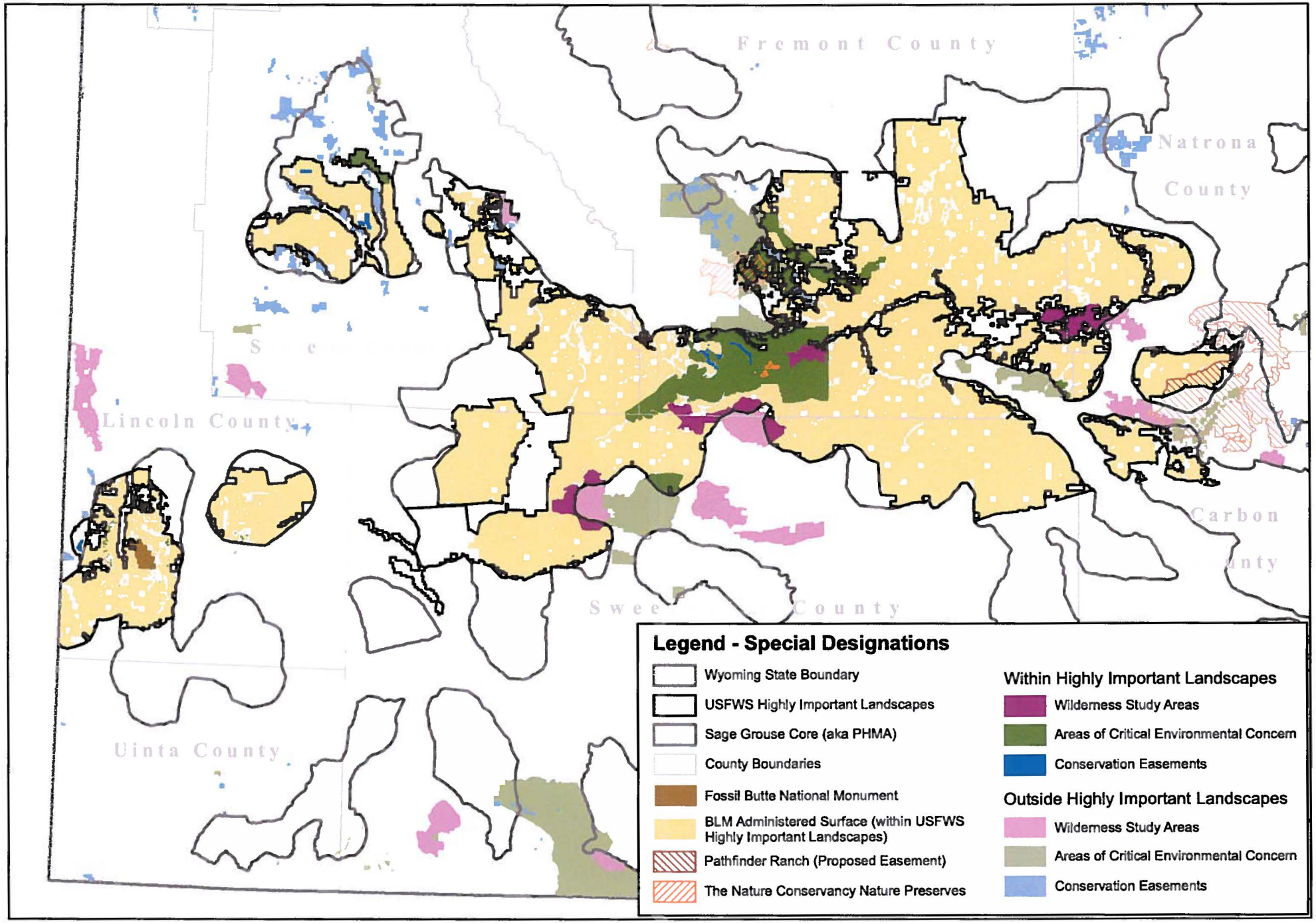
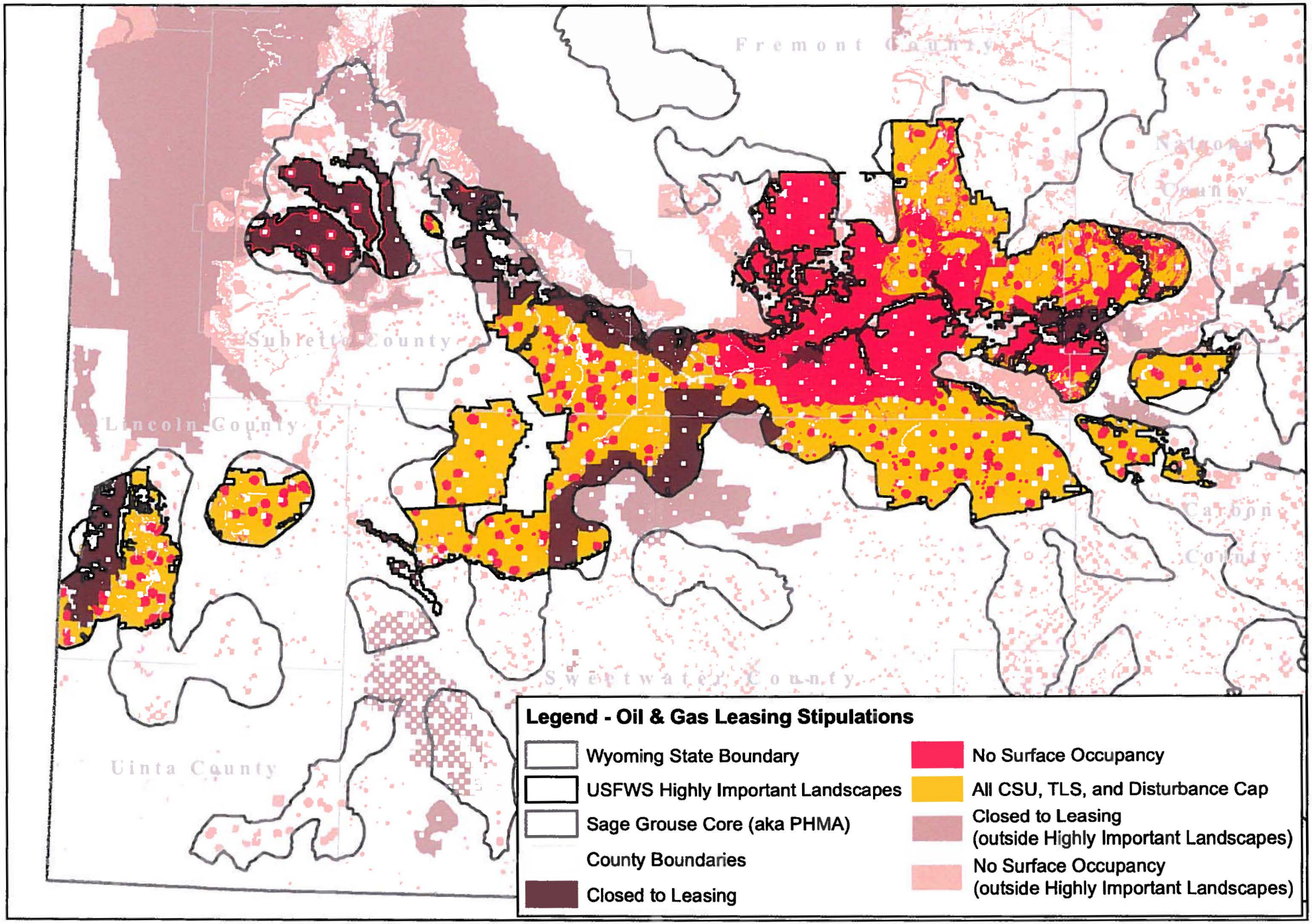
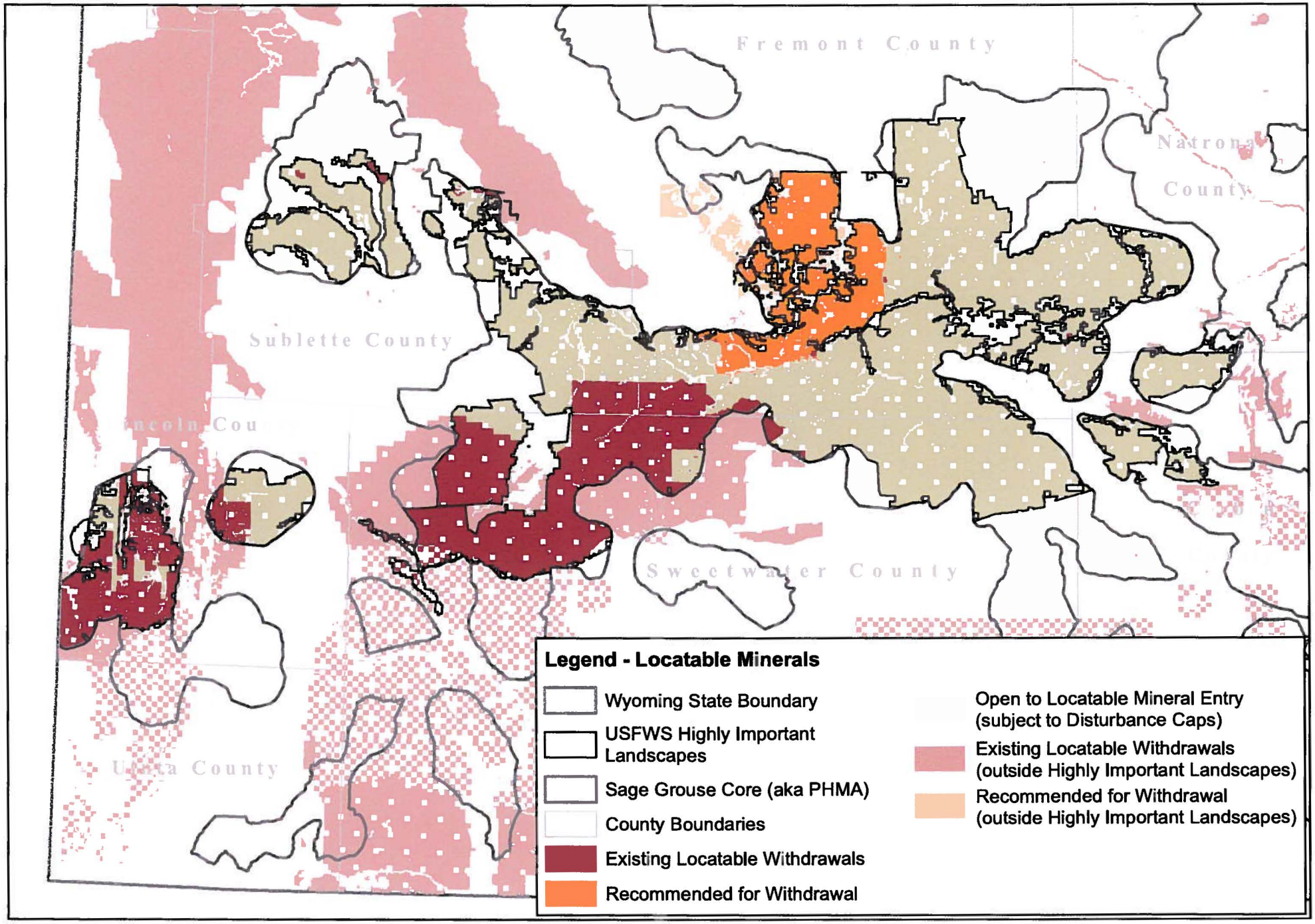
USFWS Greater Sage Grouse Highly Important Landscapes:
Wyoming Basin
ACECs, WSAs, Conservation Easements (Proposed Plan)



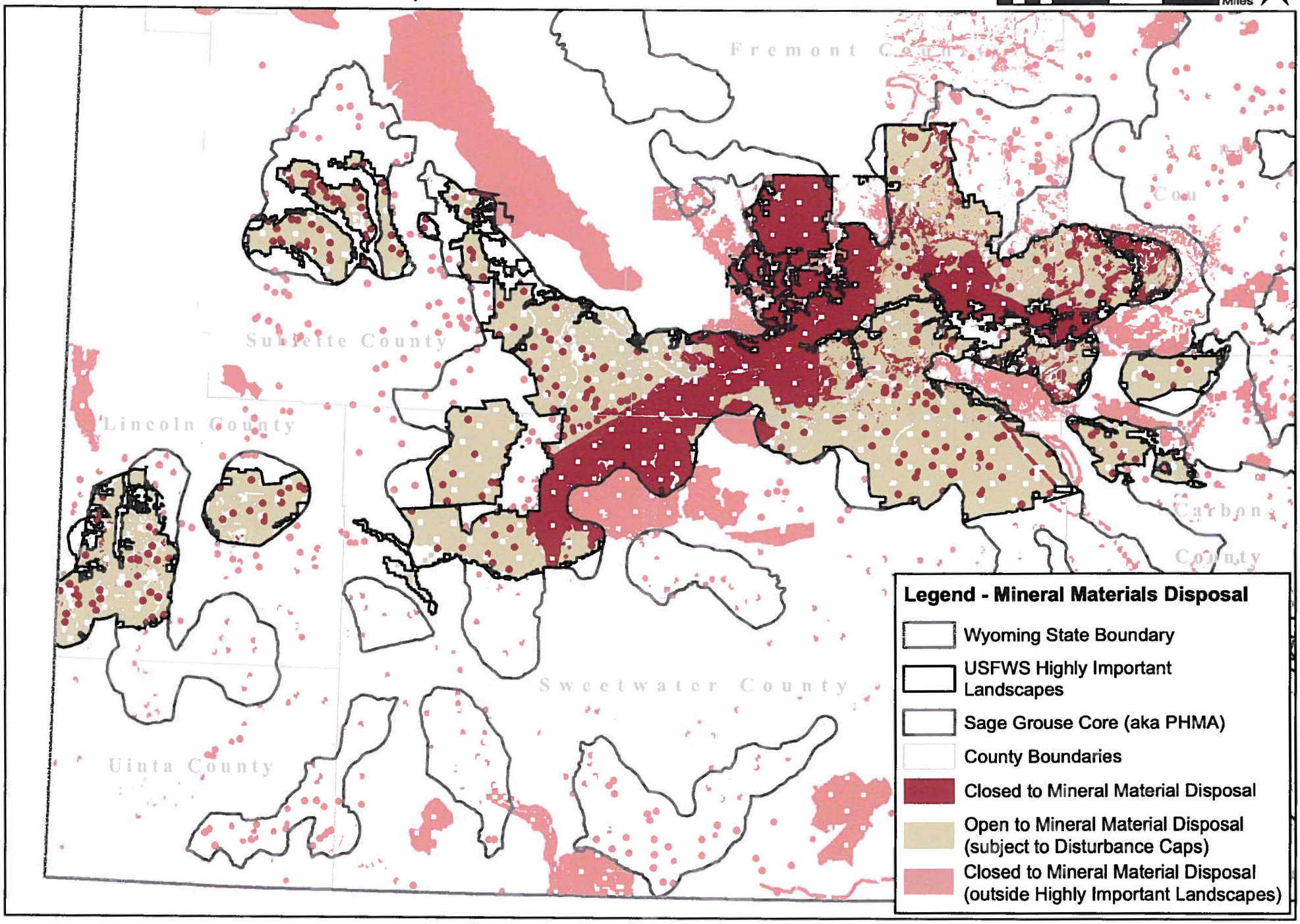
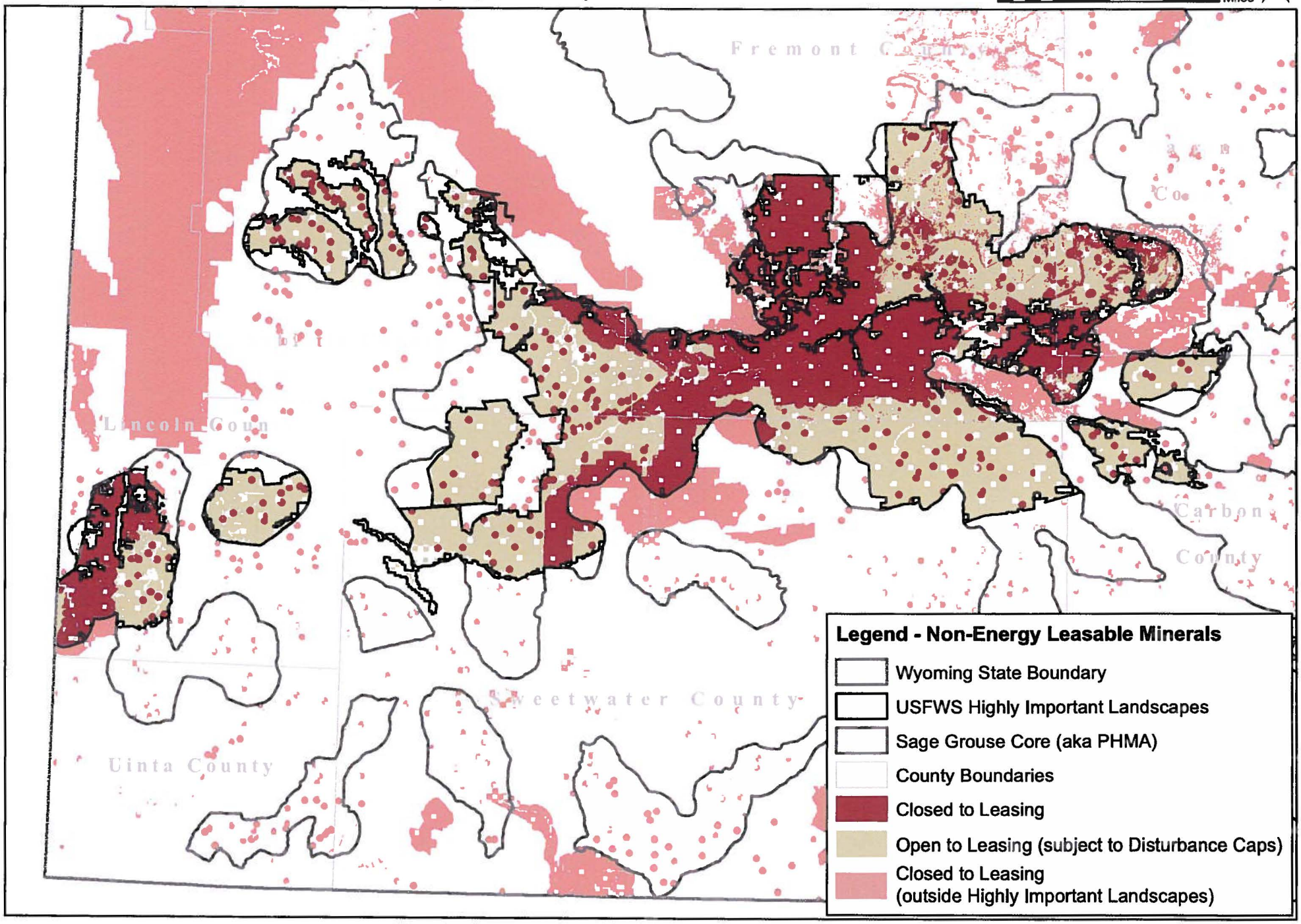
USFWS Greater Sage Grouse Highly Important Landscapes:
Wyoming Basin
Oil & Gas Leasing Stipulations (Proposed Plan)



USFWS Greater Sage Grouse Highly Important Landscapes:
Wyoming Basin
Locatable Minerals Management (Proposed Plan)



USFWS Greater Sage Grouse Highly Important Landscapes:
Wyoming Basin
Mineral Materials Disposal (Proposed Plan)



USFWS Greater Sage Grouse Highly Important Landscapes:
Wyoming Basin
Non-Energy Leasable Minerals Management (Proposed Plan)