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

Dear Director Ashe:

As the Director Representative of the Western Association of Fish and Wildlife Agencies (WAFWA) regarding Greater Sage-grouse, I wanted to take this opportunity and share our perspective on the role of hunting in the management and conservation of the Greater Sage-grouse. While the U.S. Fish and Wildlife Service (Service) is evaluating the "threats" and their effects on the long-term sustainability of this iconic species of the west, we believe the effects of the listing decision alone may have a significant adverse effect on the conservation of the bird and our long-term knowledge base. We submit a finding of warranted, coupled with the cessation of hunting, will create a situation where the funding of the majority of the conservation work directly appropriated for sage-grouse will be significantly reduced or eliminated. If the bird is listed under the Federal Endangered Species Act (ESA) and hunting is either prohibited or significantly limited beyond what is in place in the WAFWA Greater Sage-grouse hunting guidelines, many Directors may be compelled to significantly reduce the sportsmen dollars used for the management, conservation and restoration of the grouse. This is not a result we take lightly. Because many state wildlife agencies are funded in large part by sportsmen dollars, there are limitations to what we can spend those dollars on. If the Greater Sage-grouse is removed from a "state" managed species through listing under the ESA, some states will actually lose the discretion to spend license income for the species. Furthermore, most states will be compelled to consider whether it makes sense to continue to invest license income in conservation of the species in terms of probability of recovery and in light of opportunity costs relative to other species of conservation concern. This should concern all of us greatly.

In an effort to provide you with insight to how significant this may be, I asked the WAFWA Sage and Sharp-tailed Grouse Technical Committee (Technical Committee) to pull together a review of the state contributions to sage-grouse conservation since 2000 (see attached). Each state was surveyed for the expenditures contained within their agency budgets and in some cases only the wildlife budget. Thus, expenditures for Law Enforcement, Conservation Education, NGO funds or project expenditures from

"Partner Programs" like the Utah and Nevada Partners for Conservation and Development or private industry were largely not included in this assessment. Hence, the expenditure estimate should be considered a minimum estimate. As a result, we estimate since 2000 the State Fish and Wildlife Agencies expended approximately **\$131,985,608** dollars on Greater Sage-grouse conservation and management including survey and inventory, conservation planning, and research and project implementation. The States' currently contribute more than 20 percent of the annual cost of conservation as outlined in the Greater Sage-Grouse Comprehensive Conservation Strategy. Our concern is if sage-grouse are provided full protection under the ESA, much of this funding and synergy leveraged by state agencies will go away. Hence, the simple action of finding it warranted will result in unintended consequences of reduced funding and capacity to undertake fundamental conservation activities that cannot be replaced.

In addition to the financial impact on the conservation of the bird, there are a number of other related hunting issues we request you give due consideration to. These are:

- 1) The Governors/Secretary of the Interior's Sage Grouse Task Force was given four assignments, with the fourth one being, "Review and improve mechanisms to provide as much regulatory predictability for private landowners and public land users as possible in the event of a future listing of sage-grouse or other sagebrush-associated species." Our position is that hunting is one activity for which public land users (and non-public land users) would like regulatory predictability from pre-listing to post-listing, should listing occur.
- (2) In 2010 the Service found hunting was a low-ranked threat for sage-grouse when considering only the harvest of birds. No consideration was afforded to the conservation value of habitat protection and enhancements derived through the opportunity to hunt sage-grouse. Can you clarify how the Service quantifies hunting as a threat given the low level of direct take which occurs from hunting? We recognize the major threats driving population trends are habitat loss and fragmentation and the net effect of hunting, does not contribute to the long-term decline of the species. Also, would you describe how it would quantify hunting as a threat if the habitat protection and enhancement values derived through hunting are also considered? Unfortunately, a listing may restrict future conservation work of the states to the funds provided by the Service under Section 6 of the ESA. If that occurs, is adequate funding available to replace the sportsmen's dollars spent by the states?
- (3) Maintaining as broad of a set of advocates for sage-grouse conservation as possible is in the best interest of conserving the species. Thus, avoiding alienating hunters and private landowners is an excellent opportunity for maintaining engagement of sage-grouse conservation advocates, and maintaining a broader base of funding for habitat protection, enhancement and enforcement.

- (4) There are excellent examples where consumptive use of an ESA listed species continues commensurate with recovery and restoration actions. Species such as Lahontan cutthroat trout and bull trout are two examples where this is occurring. We would propose that if listed, the states be allowed to continue to hunt sage-grouse under the guidance of the WAFWA guidelines in a manner promoting species conservation.
- (5) Currently, private and non-profit hunting organizations have been and continue to be strong advocates for sage-grouse conservation. These groups not only spend their money on conservation but offer their sweat equity volunteering to count leks and conduct habitat restoration. They also have been successful around the west partnering with non-hunting groups to conserve sagebrush ecosystems. Both federal and state wildlife and land management agencies need to make every effort to support this type of alliance. We submit the Service must consider this important conservation input, or the lack thereof in their decision making process.

I want to personally thank you and your staff for your efforts to work with the states on this important listing decision. We have truly seen a paradigm shift in the way federal and state agencies approach these significant conservation issues. We share the same goal of securing the long-term viability of sage-grouse populations across our western sagebrush landscapes. In your endeavor to determine whether the Greater Sage-grouse warrants listing, it is imperative you leave no rock unturned, even if it means looking at the effects of the decision itself. And we believe in this case the unintended consequences of a listing decision of warranted for the Greater Sage-grouse will likely be enormous. Thank you for your consideration of this important issue and we look forward to your response.

Sincerely,



Kenneth E. Mayer
Director
WAFWA Lead, Greater Sage-grouse

Attachment

CC: Noreen Walsh, Regional Director USFWS Mountain-Prairie Region
Ren Lohoefer, Regional Director USFWS Pacific Southwest Region
Steve Ferrell, Wyoming Governor's Office
Leo Drozdoff, Director Nevada Department of Conservation and Natural Resources