

To the editor,

The U.S. Fish and Wildlife Service is working with a broad coalition of partners, including the energy industry, to implement as much greater sage-grouse conservation as possible prior to our September 2015 listing decision deadline. We appreciate (THIS NEWSPAPER)'s effort to keep the public informed and believe accuracy is key to an informed public discussion.

There are multiple significant threats to the greater sage-grouse across its 11-state range. All have the effect of removing, degrading or breaking up the large, intact stands of healthy sagebrush that this bird and 350 other species of wildlife, including big game species, need to survive.

In the Great Basin, for example, invasive species and fire are the primary threats. Energy development, including oil and gas production is a primary threat in the Rocky Mountain region, ~~energy development, including as oil and gas production, is a primary threat~~ because it is a major cause of habitat fragmentation. A recent op-ed in your newspaper misstated the magnitude of this threat~~this fact~~.

This same op-ed indicates that the draft Montana Sage Grouse Conservation Strategy is more restrictive of energy development than that of Wyoming, which was finalized in 2006. The MT SG Strategy and the Wyoming Strategy are not directly comparable. Wyoming sage grouse "core areas"-those areas that contain the most leks and the best habitat- contain about 84% of the sage grouse population in Wyoming and occur mostly on public lands. In Montana, about 74% of the sage grouse population is contained in "core areas" with about 54% of these lands in private ownership. In Montana, core areas occur across a fragmented private / government ownership pattern, complicating management including that of energy development. Montana is not Wyoming.

The ~~Lastly the op-ed also discusses the threat to sage--grouse from predation. P~~While predators are part of the ecosystem and have always preyed upon sage-grouse. However, ;-habitat loss, fragmentation, and disturbance, infrastructure and energy development, infrastructure, weather, urban development, and improper grazing practices inconsistent with local ecological conditions, and other factors including weather and disease can provide predator inroads, increase predation pressure on sage-grouse, and increase sage-grouse vulnerability to predation. Maintaining and restoring Good sufficient quality and quantity of intact sage-grouse habitat for sage-grouse reduces the magnitude and effects of that predation pressure and provides for stable sage-grouse populations.

We wanted to take this opportunity to correct the record, and encourage all parties to continue working to protect healthy sagebrush. In the end, sage-grouse conservation is about much more than a bird. It's about conserving a landscape that has provided so much for our nation – food, fiber, fuel, and superlative wildlife-dependent recreation – and can continue to do so for generations to come. Everyone who lives, works and plays in the sage, including the energy industry, has a role to play in achieving this important goal.

Sincerely,

Jodi L. Bush  
Montana Field Supervisor, Montana Ecological Services Office  
U.S. Fish and Wildlife Service

**Guest opinion: Sage grouse can coexist with oil production**  
**Billings Gazette ( Also published in the Missoulian and Great Falls Tribune)**  
**Published 7/28/14**  
**Dave Galt**

The threat of an impending threatened or endangered ruling for sage grouse has prompted many opinions about best management practices. **Some writers have suggested that if it weren't for oil and gas drilling, we'd have significantly greater sage grouse populations.**

**On the contrary, the U.S. Fish and Wildlife Service has identified the top threats to sage grouse in the Western United States. Energy development is not among the top five. According the USFWS, the primary threat to sage grouse is the loss of habitat due to invasive plant species like cheatgrass.**

The Montana Petroleum Association supported Gov. Steve Bullock's decision to establish a council to address made-in-Montana strategies in a way that make sense for both economic development and conservation. Unfortunately, some key decisions by the council made its plan more restrictive than the Wyoming plan already approved by the USFWS. In fact, some council determinations impose restrictions that affect oil and gas development.

#### **Cedar Creek grouse**

There continue to be many unanswered questions regarding impacts on sage grouse by a variety of identified threats. A key question is how the Cedar Creek Anticline in Fallon County, an area where some of the state's most extensive and productive oil and gas fields are located, can merit designation as "core" sage grouse habitat, even though historically no extensive restrictions on activities have ever been implemented. Clearly, this brings into serious question the notion that oil and gas development is a significant threat to sage grouse and its habitat.

Some of the purported “scientific evidence” cited by most state and federal wildlife agencies falsely claims that oil and gas development “extirpates” sage grouse populations — completely kills them off. In fact, some studies from the Pinedale field in Wyoming include pictures of development-rich areas which opponents of fossil fuels are fond of using to suggest that development has led to the demise of sage grouse populations.

How then, can some of the most densely populated sage grouse areas be located in and around those developed areas? And why do federal and state wildlife agencies refuse to re-examine this issue? This is an important consideration given that sage grouse populations are actually on the rise throughout the entire state, according to the Wyoming Game and Fish Department’s own figures.

During the public meeting tour of the Montana council’s draft conservation plan, farmers and ranchers at every stop questioned why predation was not recognized as one of the primary threats to sage grouse populations. Wildlife officials claim predation is not a primary threat; specifically, ravens, fox, coyotes, raptors and skunks do not threaten the bird’s survival. Yet these hardworking people who attended the tour live with the sage grouse every day and have seen that predation is definitely a chief threat to the health of the sage grouse.

And then there is hunting. According to wildlife officials, hunting does not affect the mortality of the bird; despite the fact that hunting is the most well-documented source of mortality with 207,433 sage grouse harvested in the grouse range between 2001 and 2007.

The Endangered Species Act has had an enormously negative impact on Montana’s economy, which will continue long into the future. Lynx and wolverines are being eyed for protective measures in central and Western Montana. Meanwhile, sage grouse and Sprague’s pipit are posing problems in Eastern Montana.

It is critically important for all management decisions to be based upon unrefuted scientific evidence and need, rather than broad assumptions made by a select few who have chosen to ignore the facts.

Montana Petroleum Association believes that based upon on-the-ground scientific evidence, revenue generating oil and gas activities have been shown to coexist with Montana’s natural heritage and wildlife, and we look forward to continuing to be part of the solution.