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FWS/R6/ES  
Greater Sage-grouse

# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

### Mountain-Prairie Region

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Mr. Mike King  
Colorado Department of Natural Resources  
1313 Sherman Street, Room 718  
Denver, Colorado 80203

Dear Mr. King:

Thank you for your recent letter providing input as to the role of habitat exchanges in the Service's development of mitigation policies. We value and recognize the innovative and collaborative nature of your ongoing conservation efforts through the development of a habitat exchange.

We are committed to Secretarial Order 3330 and the potential to improve conservation at the landscape scale by developing creative approaches for offsetting impacts to our natural resources and trust species. To that end, we are close to completing the final draft version of the "Greater Sage-Grouse Range-Wide Compensatory Mitigation Framework" to communicate some of the factors we are likely to consider in evaluating the effectiveness of mitigation programs when assessing the status of the sage-grouse. The framework is also intended to assist states and other partners as they develop or refine mitigation programs to offset unavoidable impacts to sage-grouse.

We view the development of habitat exchanges as a promising approach that could increase participation in conservation efforts and provide meaningful new approaches to compensatory mitigation efforts. We are considering how efforts like habitat exchanges may contribute to conservation as we develop new guidance and policies concerning candidate species and mitigation.

In particular, we have two concerns: 1) absent regulatory mechanisms requiring mitigation, what level of participation will habitat exchanges generate; and 2) the potential for impacts in Priority Areas for Conservation (PACs) and core areas, even if mitigated, to erode the ability to conserve the species.

We are interested in exploring specific mechanisms which would incentivize mitigation. We are also interested in approaches that would ensure the baseline does not continue to erode through development in priority habitat or PACs, notwithstanding any obligatory mitigation.

We appreciate the opportunity to provide input to the habitat exchange developed by your partnership. We strongly encourage the use of the best available science to correlate the value of credits and debits to sage-grouse population numbers for metric tools developed under this framework. A clear, scientifically defensible relationship between habitat benefits and population benefits will increase the conservation value of these innovative tools.

Thank you for your continued interest in greater sage-grouse conservation. We look forward to our continued work together to preserve and manage the landscapes of the American west.

Sincerely,

Director