

## SAGE GROUSE TASK FORCE

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### Co-Chairs

**Governor Matthew H. Mead, Wyoming**

**Governor John W. Hickenlooper, Colorado**

**Acting Director Mike Pool, Bureau of Land Management**

October 15, 2012

Dan Ashe

Director

U.S. Fish and Wildlife Service

1849 C Street, NW

Washington, DC 20240

Dear Director Ashe,

Thank you for transmittal of the Sage Grouse Conservation Objectives Team (COT) report. We firmly believe that, with further input and revisions, the U.S. Fish and Wildlife Service's undertaking of the COT report is a step forward in preventing the need to list the greater sage-grouse (sage-grouse) under the Endangered Species Act (ESA). The Service should be commended for its engagement in the State/Federal Joint Task Force and your undertaking of the COT report. This effort exemplifies the state and federal partnership under the ESA, and we look forward to continued work with the Service in order to prevent the need to list the sage-grouse.

Given the significant impact of a full listing of the sage-grouse on Western economies, we take very seriously the contents of the COT report and its intent to communicate the needs of sage-grouse at the landscape scale. The Sage-Grouse Task Force offers the following suggestions for improvement of the COT report:

- The report identifies a number of uncertainties which may affect the species. While the report acknowledges that the impact of those uncertainties is currently unclear, it should also emphasize that the adoption and implementation of comprehensive conservation strategies could successfully ameliorate threats to the sage-grouse to the point that it is not warranted for listing as threatened or endangered.
- The report should clarify that the stated conservation objectives are recommendations, not requisite conservation actions, and that conservation partners have the flexibility to determine how best to achieve the recommendations.
- Page one of the report currently states that, "Individual states either have or are in the process of completing state plans that will guide conservation for sage-grouse within their borders." In order to be accurate, that sentence should be revised to reference "several states. . . ."
- The report should clarify the distinction between "priority action areas," state priority habitat areas, and WAFWA management zones. In particular, Figure 2 on page 16 of the report should more clearly articulate the C1-C4 populations in relation to priority areas identified by states.

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- The COT report lists “improper grazing” and “inappropriate livestock management” as threats that can alter habitat suitability for sage grouse. The phrases “improper” and “inappropriate” are subjective. Revisions to the report should clarify that while proper grazing management can be a tool to improve sage-grouse habitat, reduce wildlife threats, or control invasive species, improper grazing management can be a threat that can alter habitat suitability for sage grouse.”
- The report should be revised, as necessary, to account for updates that have occurred since the report was drafted including: changes to state priority maps, the release of additional state conservation plans, impacts from this season’s wildfires, on the ground habitat improvements, and any identified errors in the report.
- The COT report expands the list of threats beyond those previously defined by the Service in their 2010 listing decision. Revisions to the report should clarify the scientific basis for the listed threats, particularly those that differ from the primary threats of habitat loss, fragmentation and lack of regulatory mechanisms outlined in the 2010 USFWS listing decision.

It cannot be overstated that this COT report is intended to develop range-wide conservation objectives that ameliorate threats to the sage grouse and compliment state and federal conservation plans by ensuring that the needs of the sage-grouse are considered at the landscape scale. We expect that all efforts will be made by the Service to ensure this report is used to inform the development and implementation of state conservation plans with diverse stakeholders in each state, since this action is strongly encouraged by your agency.

Again, thank you for the efforts of the Service to improve how state and federal agencies work together to prevent the need to list the sage-grouse. We look forward to additional discussions with you and your staff on the COT report, as it is revised to incorporate comments received during the scientific peer review process. Individual states may choose to submit their own specific comments to you regarding this COT report, and we appreciate your solicitation of feedback from this task force.

Sincerely,

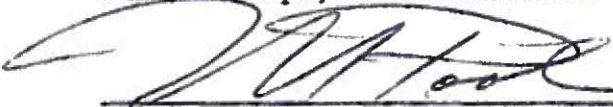
Co-chairs of the Sage Grouse Task Force



Matthew H. Mead, Governor of Wyoming



John Hickenlooper, Governor of Colorado



Mike Pool, Acting Director, Bureau of Land Management

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**cc: Governor Edmund G. Brown, California**  
**Governor C.L. "Butch" Otter, Idaho**  
**Governor Brian Schweitzer, Montana**  
**Governor Brian Sandoval, Nevada**  
**Governor Jack Dalrymple, North Dakota**  
**Governor John Kitzhaber, Oregon**  
**Governor Dennis Daugaard, South Dakota**  
**Governor Gary Herbert, Utah**  
**Governor Chris Gregoire, Washington**  
**Director Dan Ashe, U.S. Fish and Wildlife Service**  
**Chief David White, Natural Resources Conservation Service**  
**Chief Thomas Tidwell, Forest Service**  
**Michael Bean, U.S. Department of the Interior**