

November 30, 2017

The Honorable Ryan Zinke, Secretary  
U.S. Department of the Interior  
1849 C Street NW  
Washington, D.C. 20240

Dear Secretary Zinke,

For decades, we, the undersigned fish, wildlife and natural resources professionals have been dedicated to conserving, enhancing and responsibly managing America's fish and wildlife resources on both public and privately owned lands and waters. Over the past several years we have watched, and many of us engaged, as the collaboration, planning and management efforts to conserve the greater sage-grouse played out – leading to the not warranted decision in September 2015. However, to ensure this collaboration and planning for conservation of sage-grouse as a true success, we believe full implementation of the federal plans is critical.

We are writing in response to the Federal Register Notice (FR Doc. 2017-21958 Filed 10-10-17) to consider amendments to federal sage-grouse conservation plans. Prior to this Notice of Intent, the Secretary issued Secretarial Order 3353 that resulted in a review team issuing a report with recommendations to the Secretary for sage-grouse conservation on federal public lands. Based on our review of these documents, we have concerns about the Administration's stance on sage-grouse habitat conservation and management on federal lands.

We suggest that the habitat conservation measures included in the federal land use plans be implemented and monitored in an adaptive management context to evaluate their effectiveness before any amendments are proposed. First and foremost, any administrative or amendment changes must be defensible and supported by past and current scientific information. We support using all administrative, training, and guidance and clarification approaches to address issues with the federal plans that are identified through adaptive implementation of those plans. We could potentially support some targeted amendments to the plans if those amendments are supported by science through the adaptive implementation of the plans, do not alter conservation outcomes for sage-grouse, and all administrative options have been exhausted. We do not support major changes associated with amendments to the federal plans (e.g., changes to priority habitat buffers, disturbance caps or NSO requirements) unless those changes are supported by the rigorous implementation of adaptive management.

We have heard many concerns from some in industry and a few decision makers about how problematic the federal plans are for some stakeholder and user groups. However, the current federal plans already balance the conservation and management of sage-grouse priority habitat with energy development and other land uses. We do not support weakening restrictions on development within priority habitat and feel any such actions would not be supported scientifically.

We also remain concerned about how DOI has indicated its interest in managing to meet population numbers because decoupling of populations from habitat conservation is neither scientific nor acceptable. Also, the science indicates captive rearing is not a viable conservation tool for native prairie grouse, and cannot under any circumstance mitigate habitat impacts. The Department must also remember that the states retain authority for managing sage-grouse populations and they will decide if and how any population goals are established or if wildlife management actions like predator control are warranted.

It is important to note that the Policy to Evaluate Conservation Efforts (68 FR 15100) was relied on heavily by the Fish and Wildlife Service as part of the 2015 not-warranted decision. However, the requirements of certainty of implementation and effectiveness of the plans must be met for those assurances to develop and support the Service's not-warranted decision for sage-grouse. Furthermore, administrative options and clear guidance have not been exhausted prior to the Notice of Intent to amend the federal plans. We hope you will maintain this extraordinary conservation effort with minor adjustments as deemed necessary and based on science.

We appreciate you considering our input on the Notice of Intent to amend sage-grouse conservation plans. We are happy to assist you and your staff members and agencies as DOI moves forward with sage-grouse conservation, and a delegation of our signatories would like to meet and discuss these important issues.

Respectfully,

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