

Field Supervisor  
Wyoming Ecological Services Office  
U.S. Fish and Wildlife Service  
4000 Airport Parkway  
Cheyenne, Wyoming 82001

Re: Status Review of Petitions to List the Greater Sage Grouse as Threatened or Endangered under the Endangered Species Act

Ladies and Gentlemen:

I am writing to urge the U.S. Fish and Wildlife Service (Service) to list the greater sage grouse (*Centrocercus urophasianus*) as threatened or endangered under the Endangered Species Act (ESA). Sage grouse are the charismatic ambassadors of the Sagebrush Sea, a vibrant landscape beset by destructive land uses and burdened by a century of mismanagement that has reduced the ecosystem by almost half.

As Rachel Carson observed more than forty years ago in her book, *Silent Spring*, “the sage and the grouse seem made for each other. The original range of the bird coincided with the range of the sage, and as the sagelands have been reduced, so the populations of grouse have declined.” The historic range of sage grouse included parts of sixteen Western states and three Canadian provinces. However, since 1900 sage grouse populations have been reduced as their sagebrush habitat has been destroyed, degraded, and fragmented by a plethora of human activities. The species no longer occurs in Arizona, British Columbia, Kansas, Nebraska, New Mexico, and Oklahoma. Sage grouse have declined as much as 45-80 percent over the past 20 years, and the total population is now estimated at 140,000 individuals, representing only about eight percent of their historic numbers.

Destructive land uses continue on both public and private lands, despite warnings of their impacts on sage grouse and sagebrush habitat, and irrespective of efforts by state and local “working groups” to reverse current trends. The Bush Administration’s national energy plan prioritizes oil and gas development in sage grouse habitat in the heart of sage grouse range in Montana and Wyoming, despite known and foreseeable impacts on sage grouse. Public lands livestock grazing continues on parched shrublands in Colorado, Idaho, Montana, Nevada, Oregon, Utah, and Wyoming, despite the ongoing drought, which scientists at the U.S. Geological Survey worry may be the worst in 500 years. For five years the Bureau of Land Management has failed to adopt a management plan for cheatgrass on public lands (the “Great Basin Initiative”), a fire-loving non-native weed that has invaded nearly 25 million acres in Idaho, Nevada and elsewhere. Whatever sage grouse habitat remains is fragmented by roads, fencelines, and utility corridors; destroyed by mining or off-road vehicles; grazed by livestock; sprayed with herbicides and pesticides; burned by wildfire; or consumed by agricultural and municipal development. The sensitive sage grouse cannot tolerate further abuse. The new, seminal report by the Western Association of Fish and Wildlife Agencies, “Conservation of Greater Sage-Grouse and Sagebrush Habitats,” confirms the species’ plight.

Adding to the species' woes, the sagebrush habitat that sage grouse utterly depend upon continues to be mismanaged by both public and private land managers who fail to appreciate its fragility and importance to a suite of sagebrush species. Sagebrush habitats continue to be the victim of "range improvement" projects that aim to decrease or eliminate sagebrush from large areas via mechanical methods, herbicide application, and intensive fire. These misguided practices factor into the downward spiral of the greater sage grouse. Listing the sage grouse would affect much needed land management reform, which would likely not occur without the protection afforded by the ESA.

Now comes West Nile virus (WNV), a horrible disease spread by mosquitoes that killed sage grouse in Alberta, Montana, and Wyoming in 2003. Teams of scientists in Canada and the United States have recently confirmed that WNV has spread across western North America and that sage grouse have no known immunity to the disease. Evidence suggests that mosquitoes spread the disease into formerly inaccessible areas by way of coalbed methane wastewater holding ponds, a byproduct of the aforementioned rampant energy development in Wyoming, Montana and Colorado. Scientists worry that "West Nile virus could have devastating consequences for small populations of sage grouse." This is disheartening since most sage grouse only occur in small populations.

**In recent months industry front groups, such as the Partnership for the West (PW), have advocated that the Service avoid listing the sage grouse under the ESA to allow ongoing state and local planning efforts a chance to save the species (also trumpeted by the Western Governors' Association). PW's intentions are suspect, as there is no reason why state and local conservation efforts cannot proceed even after the species is listed. A recent e-mail intercepted from PW suggests the real purpose of their campaign: to protect "industry, agriculture and consumers across the West" from the possible impacts of listing. The message further states that "[s]uch a listing would cause economic disruption that would make the Northern Spotted Owl decision look miniscule by comparison." The author, PW director Jim Sims, former Director of Communications for (Vice President Cheney's) National Energy Policy Development Group, is then quick to note that, "[f]ortunately, we have good news to report in our campaign to head off this listing." Although sage grouse have become highly politicized, it is important that politics and economic doomsday scenarios not affect the Service's science-based decision on whether to list the species.**

**News reports and anecdotal evidence indicate that the local working groups touted by the Partnership for the West and the Western Governors' Association may begin to disintegrate under the threat of listing as each constituency seeks to shield their own interests from the ESA protections that would follow. Miners are blaming drought, fire and grazing for the present crisis; public lands graziers are blaming hunters and energy companies; energy companies are blaming graziers and state and federal regulations; and on and on. Interestingly, PW's primary interest in these local working groups is reportedly to "determine whether industry representatives are involved in these groups" and "where industry reps are not active on a working group, seek to find someone who is willing to engage." One must wonder how these industry representatives intend to influence these groups if sage grouse are not afforded protection under the ESA.**

Federal listing for the sage grouse is vital because state and local agencies have failed to protect sage grouse and their sagebrush habitat. While sage grouse numbers have continued to decline, meaningful regulatory mechanisms are virtually non-existent and existing management is inadequate to conserve the bird. Federal land managers, most notably the Bureau of Land Management (BLM), have failed to manage their lands effectively for sage grouse. The agency prioritizes livestock grazing and now energy development, not sage grouse conservation or ecosystem health. Similarly, the Intermountain Region of the U.S. Forest Service is refusing to reexamine its livestock grazing policies in light of the ongoing drought, despite widespread evidence that livestock impacts are amplified during periods of low precipitation.

State wildlife agencies have not done much better. While all states within sage grouse range have completed or are in the process of completing state and local conservation plans, these plans are voluntary, provide no additional mandatory protection for the sage grouse, and are often written by the ranchers, ATV enthusiasts, power companies, industrialists, and wildlife managers responsible for the sage grouse's decline. Only the stringent protections afforded by the ESA will set a minimum baseline for protection and require the changes in behavior required to save the species.

Lewis and Clark reported seeing sage grouse during their journey to the Pacific coast, calling them "the cock of the plains." Native American tribes subsisted on sage grouse, and created costumes and dances to emulate their magnificent spring mating rituals. Settlers reported clouds of sage grouse so thick that when roused to flight they darkened the sky. Saving this species is saving the West, and preserving our inheritance for future generations. The wide-ranging grouse is also an umbrella species for the Sagebrush Sea. Listing the grouse would benefit other imperiled sagebrush obligate species, such as pygmy rabbit, mountain quail, slickspot peppergrass, white-tailed prairie dog, and southern Idaho ground squirrel. In addition, a variety of other species are integrally linked with this habitat and would benefit from sage grouse listing, including sage thrasher, Brewer's sparrow, sage sparrow, sagebrush lizard and sagebrush vole.

Please consider carefully the needs of sage grouse and the potential consequences of not listing this species under the Endangered Species Act. Thank you for this opportunity to comment.

Sincerely,

Mark Salvo  
Director  
Sagebrush Sea Campaign