



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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June 2, 2014

Ren Lohofener, Regional Director
U.S. Fish and Wildlife Service
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GREATER SAGE-GROUSE BI-STATE DISTINCT POPULATION SEGMENT

Dear Mr. Lohofener:

I am writing to comment on your agencies' proposal to list the Greater Sage-Grouse Bi-State Distinct Population Segment (DPS) as threatened under the Endangered Species Act (ESA) and to express the Department of Fish and Wildlife's (Department's) commitment to cooperative conservation of this species as described below. The Bi-State DPS contains the best sage-grouse populations in California. The conservation of this unique species and its habitats is a high priority for the Department and will result in the preservation of a treasured California landscape for generations to come.

The Department has worked with the Nevada Department of Wildlife (NDOW) and the Bi-State Local Working Group, including federal and private stakeholders, since 2000 to conserve sage-grouse in the Bi-State area. More recently, the Department has been working with the Bi-State Executive Oversight Committee (EOC), which was formed in 2011 to guide sage-grouse conservation in the Bi-State DPS. The Bi-State Technical Advisory Committee subsequently completed the Bi-State Action Plan for Conservation of the Greater Sage-Grouse Bi-State Distinct Population Segment in March, 2012.

Our Department has been actively involved in sage-grouse conservation for decades, including conducting extensive lek counts to determine population trends every year in the Bi-State area since 1953. These lek counts have become even more comprehensive over the past several years, with multiple counts conducted on each known lek each spring. In 2012 and 2013, we worked with NDOW to conduct helicopter surveys to identify lek sites throughout the Bi-State DPS. The Department will continue to conduct these counts annually and make it a priority for available funding.

In addition to spring lek counts, the Department has spent more than \$1,000,000 since 2003 on research projects that have provided substantial information and form much of the current understanding of sage-grouse ecology in the Bi-State DPS. These data have been used to develop a strong scientific approach to conservation for this DPS including both the Conservation Planning Tool (CPT) and the Integrated Population Model (IPM) recently completed by USGS and Technical Committee. The newly released IPM provides the best science on population trends and predicts population trajectories by subpopulations within the Bi-State DPS to date. This analysis shows that

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Ren Lohoefer, Regional Director
U.S. Fish and Wildlife Service
June 2, 2014
Page 2

recent trends in the core populations have been at record high levels and stable over time, but that some of the smaller peripheral populations are at higher risk of extirpation. The Department is currently developing a plan to translocate grouse to at least one of these small populations as discussed below. The Department remains committed to participating in this science-based approach to inform conservation actions to reduce the threats to sage-grouse in the Bi-State area.

Since 2005, the Department's Wildlife Conservation Board (WCB) has acquired approximately 1,235 acres in the Fales-Desert Creek Population Management Unit (PMU) to protect critical sage-grouse breeding and nesting habitat on Burcham and Wheeler Flats in northern Mono County. The Department was also pivotal in constructing and funding conservation easements on approximately 180 acres of private lands in southern Mono County that are now managed by the Eastern Sierra Land Trust (ESLT). Additionally, the WCB provided funding for the 1,200 acre Sinnimon Meadow conservation easement, which comprises important sage-grouse summer range habitat in the Bodie PMU. The Department remains committed to continuing to pursue land acquisition opportunities and in working with the ESLT to secure conservation easements with willing landowners to protect and conserve sage-grouse habitat within the range of the Bi-State DPS.

Moving forward, the Department commits to implementation of specific projects outlined in the Bi-State Action Plan in partnership with other agencies and entities. As mentioned earlier, the Department is currently making plans to conduct a translocation of sage-grouse to Parker Meadows in the South Mono PMU as a first priority and will pursue similar actions in other small populations. We will develop this in coordination with the Bi-State agencies. The IPM demonstrates that the Parker population has a high risk of extirpation over the next 5 years. During our research from 2007-2011, we found several hens failed to hatch nests after the incubation period and further analysis by USGS suggests that these eggs were not fertile. The planning tool demonstrates that the habitat quality at Parker is high and the Department believes translocation of grouse to this population could help in its recovery.

We are currently working with NDOW and other partners to develop a grouse monitoring program throughout the Bi-State DPS and plan to monitor the effects of ravens and other predators surrounding the Mono County landfill in Long Valley as identified in the Action Plan. The primary funding sources for sage-grouse in our Department come from Federal Aid programs including; Section 6 of the Endangered Species Act, State-Wildlife Grants, and Wildlife and SportFish Restoration Grants.

The Department will remain committed to sage-grouse conservation in the Bi-State DPS whether the species is listed under the ESA or not. However, we think the body of science and conservation actions that have been developed under the lead of the EOC is an extraordinary local conservation effort that has the greatest potential for recovery and conservation of this species. The combination of science, partnerships, and

Ren Lohofener, Regional Director
U.S. Fish and Wildlife Service
June 2, 2014
Page 3

commitments that have been brought to this effort represent the best model for conservation of sage-grouse in the Bi-State that we have seen to date and we urge you to support this strategy.

We are providing this letter to you as part of a package of information through the Bi-State EOC during the comment period on your agencies' proposal to list the Bi-State DPS as threatened under the Endangered Species Act. Relevant products include: 1) the 2012 Bi-State Action Plan, including the CPT; 2) the spreadsheet of past, present, and future actions developed from the plan; and, 3) the IPM recently completed by the USGS and Technical Committee. These products, together with each of our agencies' letters of commitment, comprise a package of science-based planning, specific actions, and funding commitments that provide the best possible assurances that this plan will be implemented and effective in conserving greater sage-grouse in the foreseeable future.

I appreciate the opportunity to comment on this issue. If you have any questions or need additional information from the Department to consider in your listing determination, please contact Dr. Eric Loft at (916) 445-3555 or at eric.loft@wildlife.ca.gov.

Sincerely,



Charlton H. Bonham
Director

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Ren Lohofener, Regional Director
U.S. Fish and Wildlife Service
June 2, 2014
Page 4

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