

JAMES N. DOUGLAS, (NE)  
President

LARRY L. KRUCKENBERG, (WY)  
Secretary

STEPHEN BARTON, (VA)  
Treasurer



CARTER SMITH, (TX)  
First Vice President

TONY WASLEY, (NV)  
Second Vice President

SCOTT TALBOTT, (WY)  
Third Vice President

---

522 Notre Dame Court, Cheyenne, Wyoming 82009, 307-638-1470, [www.wafwa.org](http://www.wafwa.org)

May 16, 2013

The Honorable Sally Jewell  
Secretary of the Interior  
Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

Dear Secretary Jewell:

Prior to Secretary Salazar's retirement, he received a scientist "sign-on" letter dated January 15, 2013. The Western Association of Fish and Wildlife Agencies (WAFWA), representing all state wildlife jurisdictions across the entire sage-grouse range, is writing to express our concerns with the management approach advocated by this letter. Simply put, we believe it would represent a setback to sage-grouse conservation.

The January 15 letter asks that the Bureau of Land Management (BLM) apply scientific knowledge in the Sage-Grouse National Technical Team (NTT) report to current management of sagebrush habitats and in all revisions of Resource Management Plans across the range of greater sage-grouse. Their letter states, "We argue that the NTT report offers the best scientifically supportable approach to reduce the need to list sage-grouse as a threatened or endangered species."

The NTT report provides valuable information. However, WAFWA member states, in developing sage-grouse management plans, did not adopt or endorse any one scientific publication to the exclusion of others. Instead, WAFWA member states believe that a number of peer-reviewed publications, including the NTT, the volume on greater sage-grouse ("Greater Sage-Grouse: Ecology and Conservation of a Landscape Species and its Habitats" - co-editors Drs. Steven T. Knick and John W. Connelly), and other current and relevant scientific information - collectively - constitute the best available science for sage-grouse and should be used in our effort to conserve the species and preclude the need for listing under the Endangered Species Act (ESA).

For example, management and regulatory mechanisms should be based upon the best available science, reflected in multiple peer-reviewed publications and which embrace empirically derived knowledge and local variation in environmental conditions. This approach provides the best strategy for near- and long-term management of sage-grouse and provides the best opportunity for precluding the need to list the species under the ESA.

Applying a “one-size-fits-all” approach focusing solely on the NTT report is not appropriate for management of the variations that occur across the sage-grouse range.. Our concern is that using the NTT, in vacuum, would undermine sage-grouse conservation range-wide.

In addition, the “one-size-fits-all” approach is at odds with the sage-grouse management guidelines paper (Connelly et. al. 2000. *Wildlife Society Bulletin*) referenced and supported in the NTT report. The authors of this paper argued that, “Because of gaps in our knowledge and regional variation ...the judgment of local biologists and quantitative data from population and habitat monitoring are necessary to implement the guidelines correctly.” The guidelines paper concludes, “Local differences in conditions that affect sage-grouse populations may occur and should be considered in conservation plans.” This is the approach WAFWA member states in the sage-grouse range have taken in the development of their management plans and have recommended that the BLM and U.S. Forest Service use to revise their land use plans.

In conclusion, WAFWA member states are using the best available science in their efforts to conserve sage-grouse and sagebrush habitats. We appreciate your consideration of our perspective.

Sincerely,

A handwritten signature in black ink that reads "James N. Douglas". The signature is written in a cursive, flowing style.

James N. Douglas  
WAFWA President

cc: Secretary Tom Vilsack, Department of Agriculture  
Director Daniel Ashe, U.S. Fish and Wildlife Service  
Director, Bureau of Land Management  
WAFWA Directors