



# United States Department of the Interior

## Pacific Southwest Region FISH AND WILDLIFE SERVICE

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June 20, 2014

Tim Rubald  
Program Manager  
Sagebrush Ecosystem Council  
201 S. Roop Street, Suite 101  
Carson City, Nevada 89701

Dear Fellow Council Members;

Subject: Sage Grouse Conservation Objectives

I am sorry that I am unable to make the rescheduled June 23, 2014, meeting of our group, the Sagebrush Ecosystem Council (SEC). I understand there were concerns raised at the May, 30, 2014, SEC meeting, regarding the importance of the Conservation Objectives Team (COT) Report to evaluations of the State of Nevada's plan for greater sage-grouse. I'd like to reiterate the U.S. Fish & Wildlife Service's (Service's) position on this.

In 2012, the Secretary of the Interior invited states potentially affected by a decision whether to list greater sage-grouse under the Endangered Species Act (ESA) to form a Task Force, to address concerns. This Task Force includes the State of Nevada as well as other states, and was led by the Governors of Wyoming and Colorado.

The state-led Task Force asked the question of how much conservation might be required to adequately conserve greater sage-grouse. In response, the COT was formed, comprised of 10 representatives from the states (including Nevada) and 5 from the Service, and they produced the COT Report.

The state-led Task Force then recommended each state conduct a "self-assessment" to determine progress on their conservation plan development. The State of Nevada's Sagebrush Ecosystem Technical Team (SETT) completed the assessment of the Nevada state plan last October, finding that none of the 30 measures in the COT Report were fully met by the state plan, and only 11 measures were partially met by the state plan.

Tim Rubald

June 20, 2014

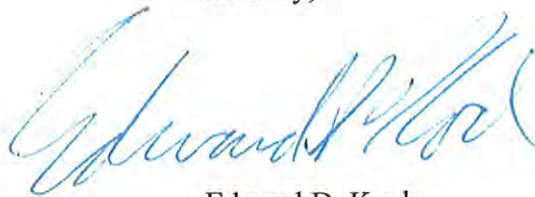
If some now prefer to no longer use the COT Report as a frame of reference, then perhaps it is possible to stop doing so. However, if this is the case, then I strongly urge those who may prefer an alternative approach to propose specific ideas, and to seek agreement from the Task Force and the Service on any new approach.

Alternatively, if those of us working in Nevada wish to continue using the COT Report as a frame of reference, but we do not intend to meet some of the COT Report's objectives, then it would be helpful to clarify these intentions. In any case, I urge us to address the record that has now been created regarding the adequacy of the State of Nevada's plan, specifically in terms of its ability to meet COT Report objectives.

Regarding the Conservation Credit System (CCS), it has been clear that the State's and our (the SEC's) position is that we would use a market-based approach to avoid and minimize development impacts on the most valuable habitats, while mitigating impacts that do occur. It has also been clear that effectiveness of the CCS would be demonstrated through implementation, so that results could be documented before the Service's September, 2014 data call related to our decision regarding whether to list greater sage-grouse. While we have all supported this approach, it now seems clear the CCS will neither be completed nor implemented in advance of our September, 2014, data call. In light of this, I suggest that we identify a new approach for how to best evaluate the effectiveness of the CCS portion of the State of Nevada's plan.

Finally, I will remind us all that the most significant threat to greater sage-grouse in the Great Basin is from invasive species and wildfire. Focusing our state planning efforts on development impacts is helpful for addressing the threat of inadequate regulatory mechanisms, at least on federal lands. I encourage us to shift our focus soon back to developing a cohesive approach to the largest threat of habitat loss and fragmentation: invasive species and wildfire. I also encourage us to act on the opportunity and address the need to ensure effective conservation of greater sage-grouse habitat on private lands.

Sincerely,



Edward D. Koch  
State Supervisor