December 5, 2014

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

RE: Federal Efforts in Range-wide Conservation of Greater Sage-Grouse

Dear Secretary Jewell:

We are a consortium of independent chapters of the National Audubon Society. We applaud recognition by the Department of Interior of the urgent need for rapid, meaningful, landscape-scale sage-grouse conservation actions. We are writing you collectively because we are interested in the establishment of effective, proactive management actions, long-term habitat protections, and funding mechanisms that will bolster Greater Sage-Grouse populations and avoid the need to federally list this iconic species. We believe that the Department of Interior should address the threats to sage-grouse through coordinated and consistent application of science to policy and management actions. While the challenge is great, we firmly believe that success is possible and could be one of the defining conservation efforts of this administration.

A historic effort is underway to protect an imperiled ecosystem—the sagebrush steppe that crosses the Western United States. However, that effort is compromised by myriad threats, and will require bold action to succeed. Habitat loss and fragmentation resulting from wildfire, energy development, urbanization, agricultural conversion, and infrastructure development are all increasing threats to the species. Yet there is still an immediate opportunity for the Department of Interior to act and protect the sage-grouse.

According to the U.S. Fish and Wildlife Service’s (USFWS) March 2010 listing decision, Greater Sage-Grouse populations have been declining since the 1960s. Population projections and the USFWS’ analysis of threats suggest the declining population trend will continue across the species’ range, and extirpation is anticipated in areas affected by energy development and increased wildfire frequency within the next 30 to 100 years.

There are significant additional benefits gained from protecting Greater Sage-Grouse habitat, including preserving habitat for other at-risk species, wilderness-
quality lands, and migration corridors and other important landscapes for elk, mule deer and pronghorn antelope. In addition, local economies benefit from healthy wildlife habitat through a multibillion-dollar outdoor recreation/tourism industry. Communities will enjoy unparalleled recreation opportunities and safe spaces for children to experience the outdoors.

About 51 percent of sagebrush habitat within the sage-grouse range is managed by the Bureau of Land Management (BLM). According to the USFWS’ March 2010 listing decision, the BLM’s Resource Management Plans (RMPs) “represent a regulatory mechanism that has the potential to ensure that the species and its habitat are protected during permitting and other decision-making on BLM lands.”

These RMPs specify management of all land use activities on their lands including travel, energy development, grazing, wildfire, and invasive species management all of which have the potential to affect sage-grouse, including direct effects to the species and its habitats.

As this important planning process goes forward with the BLM’s RMPs, we encourage meaningful engagement by federal agency personnel. Concerted and cooperative efforts at the local, national, and federal scale can protect the Greater Sage-Grouse and prevent the necessity of an Endangered Species Act (ESA) listing. Maintaining these conservation efforts in a collaborative manner is necessary for ensuring that sage-grouse remain a state-managed species across the western landscape. It is particularly critical at this contentious time as some Congressmen and states seek to delay the ESA decision and undermine conservation work.

This landscape-scale planning and subsequent implementation is the only way to ultimately prevent the need for an ESA listing; delays and setbacks will only make this issue more difficult and expensive to address.

At Audubon, we believe an effective strategy for protecting the Greater Sage-Grouse will incorporate the following four considerations:

- The BLM strategy, which includes both short-term and long-term approaches, must result in the consistent application of adequate regulatory mechanisms that are scientifically defensible. Given the expanse of sage-grouse habitat managed by the BLM and the short timeline proposed for this regional planning effort, inconsistent application of regulatory protections within states and across the sage-grouse’s range could be detrimental to sage-grouse conservation efforts.

- High priority areas for conservation and restoration should be designated by BLM’s planning process across the range as core areas. Management actions within these core areas should focus on maintaining and enhancing grouse

Working to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity.
habitats and viable populations. However, populations that are small and isolated (such as along the periphery of their range or on seasonal habitats) must also be included in the planning process and given special management considerations. Connectivity areas between populations within states and across state boundaries should be included for consideration and afforded appropriate protections.

- Surface disturbance thresholds are a means of minimizing infrastructure densities, but do not address the distance effect—or indirect effect—of infrastructure. Consider developing and implementing an approach for siting allowable infrastructure within priority areas where direct and indirect effects of infrastructure are minimized.

- Consider developing and implementing a rigorous approach to population and habitat monitoring that explicitly ties measures of habitat condition to population metrics currently being collected (e.g., lek counts; wing barrel information). The approach should be implemented iteratively to effectively inform and guide adaptive management protocol.

The sage-grouse fed the eastward migration of the Native Americans and the westward migration of the European Americans. Although its population once numbered 16 million, it is estimated that there are as few as 400,000 birds remaining today. We see this time, and the efforts underway by federal and state land managers, as critical in determining whether sage-grouse remain an iconic presence on the landscape.

We urge you to take advantage of this narrowing window of time — before the USFWS makes its final determination in September 2015 — to make these Resource Management Plans meaningful in their protections of Greater Sage-Grouse. We recognize that because of the large range occupied by sage-grouse, all stakeholders have an interest in the success of this effort. As Audubon chapters, we welcome the opportunity to engage with federal decision-makers (e.g. BLM and USFWS) at the local, regional, and federal level to ensure that local stakeholders’ voices are heard during this historic time for wildlife conservation.

Respectfully,

Ken Marion
President
Birmingham Audubon Society
Birmingham, AL

Pat Donnell
President
Arkansas River Valley Audubon Society
Morrilton, AR
<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Society</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jane Gulley</td>
<td>President</td>
<td>Audubon Society of Central Arkansas</td>
<td>Little Rock, AR</td>
</tr>
<tr>
<td>Ron Kew</td>
<td>Vice President</td>
<td>Garland County Audubon Society</td>
<td>Hot Springs, AR</td>
</tr>
<tr>
<td>Richard H. Kroetz</td>
<td>President</td>
<td>Hot Springs Village Audubon Society</td>
<td>Hot Springs Village, AR</td>
</tr>
<tr>
<td>Bob Hartman</td>
<td>Conservation Chair</td>
<td>Little Red River Audubon Society</td>
<td>Clinton, AR</td>
</tr>
<tr>
<td>Robert Weissler</td>
<td>Vice President</td>
<td>Huachuca Audubon Society</td>
<td>Sierra Vista, AZ</td>
</tr>
<tr>
<td>Matthew Crozier</td>
<td>President</td>
<td>Northern Arizona Audubon Society</td>
<td>Sedona, AZ</td>
</tr>
<tr>
<td>Haylie Hewitt</td>
<td>President</td>
<td>Sonoran Audubon Society</td>
<td>Glendale, AZ</td>
</tr>
<tr>
<td>Nancy Meister</td>
<td>President</td>
<td>Yuma Audubon Society</td>
<td>Yuma, AZ</td>
</tr>
<tr>
<td>Stephen Overlock</td>
<td>President</td>
<td>Altacal Audubon Society</td>
<td>Chico, CA</td>
</tr>
<tr>
<td>David &amp; Kathy Billings</td>
<td>President, Secretary</td>
<td>Buena Vista Audubon Society</td>
<td>Oceanside, CA</td>
</tr>
<tr>
<td>Peter Pumphrey</td>
<td>President</td>
<td>Eastern Sierra Audubon Society</td>
<td>Bishop, CA</td>
</tr>
<tr>
<td>Harry Love</td>
<td>President</td>
<td>Kern Audubon Society</td>
<td>Bakersfield, CA</td>
</tr>
<tr>
<td>Brenda Burnett</td>
<td>President</td>
<td>Kerncrest Audubon Society</td>
<td>Ridgecrest, CA</td>
</tr>
<tr>
<td>Philip Glaser</td>
<td>Conservation Chair</td>
<td>Laguna Hills Audubon Society</td>
<td>Laguna Woods, CA</td>
</tr>
<tr>
<td>Michael Taaffe</td>
<td>President</td>
<td>La Purisima Audubon Society</td>
<td>Lompoc, CA</td>
</tr>
<tr>
<td>Gordon Beebe</td>
<td>President</td>
<td>Madrone Audubon Society</td>
<td>Santa Rosa, CA</td>
</tr>
</tbody>
</table>

*Working to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth’s biological diversity.*
Barbary Salzman  
President, Conservation Chair  
Marin Audubon Society  
Mill Valley, CA

Blake Matheson  
President, Conservation Chair  
Monterey Audubon Society  
Carmel, CA

Evelyn Cormier  
President  
Ohlone Audubon Society  
Hayward, CA

David Quadhamer  
President  
Palos Verdes/South Bay Audubon  
Palos Verdes, CA

Chuck Vaughn  
President  
Peregrine Audubon Society  
Mendocino, CA

Dan Guthrie  
Conservation Chair  
Pomona Valley Audubon Society  
Claremont, CA

Jerry Williams  
President  
Plumas Audubon Society  
Quincy, CA

Roberta Lyons  
President  
Redbud Audubon Society  
Lake County, CA

Hal Genger  
President  
Redwood Region Audubon Society  
Eureka, CA

Keith G. Wagner  
Conservation Chair  
Sacramento Audubon Society, Inc.  
Sacramento, CA

Ed Henry  
President  
San Diego Audubon Society  
San Diego CA

Drew Feldmann  
Conservation Chair  
San Bernardino Valley Audubon Society  
San Bernardino, CA

Stephen J. Ferry  
Co-President  
Santa Barbara Audubon Society  
Santa Barbara, CA

G. Victor Leipzig, Ph.D.  
President  
Sea and Sage Audubon Society  
Irvine, CA

Salvatore Salerno  
President  
Stanislaus Audubon Society  
Modesto, CA

Bruce Schoppe  
President  
Ventura Audubon Society  
Ventura, CA
<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Organization</th>
<th>Location, State</th>
</tr>
</thead>
<tbody>
<tr>
<td>Christine A. Bucher</td>
<td>President</td>
<td>Aiken Audubon Society</td>
<td>Colorado Springs, CO</td>
</tr>
<tr>
<td>Peg Rooney</td>
<td>President</td>
<td>Arkansas Valley Audubon Society</td>
<td>Pueblo, CO</td>
</tr>
<tr>
<td>Michele Ostrander</td>
<td>Board President</td>
<td>Audubon Society of Greater Denver</td>
<td>Denver, CO</td>
</tr>
<tr>
<td>Jon Horn</td>
<td>President</td>
<td>Black Canyon Audubon Society</td>
<td>Delta, CO</td>
</tr>
<tr>
<td>Pamela M. Piombino</td>
<td>President</td>
<td>Boulder County Audubon Society</td>
<td>Boulder, CO</td>
</tr>
<tr>
<td>Chuck Aid</td>
<td>Conservation Chair</td>
<td>Evergreen Audubon Society</td>
<td>Evergreen, CO</td>
</tr>
<tr>
<td>Nic Korte</td>
<td>Conservation Chairman</td>
<td>Grand Valley Audubon Society</td>
<td>Grand Junction, CO</td>
</tr>
<tr>
<td>Becky Herman</td>
<td>Board President</td>
<td>Weminuche Audubon Society</td>
<td>Pagosa Springs, CO</td>
</tr>
<tr>
<td>Delia Malone</td>
<td>Vice-Chair</td>
<td>Roaring Fork Audubon Society</td>
<td>Carbondale, CO</td>
</tr>
<tr>
<td>Dennis Riordan</td>
<td>President</td>
<td>Menunkatuck Audubon Society</td>
<td>Guilford, CT</td>
</tr>
<tr>
<td>Nick Lund</td>
<td>Treasurer</td>
<td>Audubon Society of the District of Columbia</td>
<td>Washington, DC</td>
</tr>
<tr>
<td>Anne Casella</td>
<td>President</td>
<td>Alachua Audubon Society</td>
<td>Gainesville, FL</td>
</tr>
<tr>
<td>Carl Veaux</td>
<td>Board Member</td>
<td>Audubon of Southwest Florida, Inc.</td>
<td>Cape Coral, FL</td>
</tr>
<tr>
<td>Mary Jo Capra</td>
<td>President</td>
<td>Bay County Audubon Society</td>
<td>Panama City, FL</td>
</tr>
<tr>
<td>John Hood</td>
<td>President</td>
<td>Clearwater Audubon Society</td>
<td>Clearwater, FL</td>
</tr>
<tr>
<td>Jacqui Sulek</td>
<td>Conservation Chair</td>
<td>Four Rivers Audubon Society</td>
<td>Lake City, FL</td>
</tr>
</tbody>
</table>

Working to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth’s biological diversity.
Paula Wehr
President
**Halifax River Audubon Society**
Daytona Beach, FL

Linda Vanderveen
President
**Hernando Audubon Society**
Brooksville, FL

Jim Stephenson
President
**Manatee County Audubon Society**
Bradenton, FL

Richard Baker
President
**Pelican Island Audubon Society**
Vero Beach, FL

Joyce King
President
**Santa Fe Audubon**
Melrose, FL

Grant Campbell
Conservation Chair
**South Florida Audubon Society**
Miami, FL

Don Picard
President
**Southeast Volusia Audubon**
New Smyrna Beach, FL

Peter Day
President
**West Pasco Audubon Society**
New Port Richey, FL

Andre Coquerel
President
**Ocmulgee Audubon Society**
Macon, GA

Dick Sayles
President
**Quad City Audubon Society**
Blue Grass, IA

Tom Schilke
President
**Prairie Rapids Audubon Society**
Cedar Falls, IA

Eula Hickam
President
**Coeur d'Alene Audubon Society**
Coeur d'Alene, ID

Michele Crist
President
**Golden Eagle Audubon Society**
Boise, ID

Ron Force
President
**Palouse Audubon Society**
Moscow, ID

Chuck Trost, Ph.D.
Field Trip Chair
**Portneuf Valley Audubon Society**
Pocatello, ID

Mark Delwiche
President
**Snake River Audubon Society**
Idaho Falls, ID
Jim Rogers  
President  
Mission Mountain Audubon Society  
Polson, MT

Gerry Luginbuhl  
President  
Wake Audubon Society  
Raleigh, NC

Jack Kirkley  
Conservation Chair  
Pintler Audubon Society  
Dillon, MT

Charley Winterbauer  
President  
Cape Fear Audubon Society  
Wilmington, NC

Beth Hill  
President  
Upper Missouri Breaks Audubon Society  
Great Falls, MT

Laurine Blankenau  
President  
Audubon Society of Omaha  
Omaha, NE

Tom Tribble  
President  
Elisha Mitchell Audubon Society  
Asheville, NC

Wendy Malmid  
Board Member  
Monmouth County Audubon  
Red Bank, NJ

Bob Cherry  
President  
High Country Audubon Society  
Boone, NC

C. Sharyn Magee  
President  
Washington-Crossing Audubon  
Pennington, NJ

Jill Palmer  
President  
Mecklenburg Audubon Society  
Charlotte, NC

Raymond VanBuskirk  
President  
Central New Mexico Audubon  
Albuquerque, NM

Russell Regnery  
President  
Highlands Plateau Audubon Society  
Highlands, NC

Nancy Kaminski  
President  
Southwestern New Mexico Audubon Society  
Silver City, NM

Jack Jezorek and Dennis Burnette  
Co-Chairs  
T. Gilbert Pearson Audubon Society  
Greensboro, NC

Loren Smith  
Executive Director  
Buffalo Audubon Society  
North Java, NY

Working to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity.
Work in g t o c on s e r ve a n d r e s tore n a tu r a l e c os y s te m s , f oc u s in g on b i r d s , o t h e r w ild l i f e , a n d t h e i r h a b i t a t s f o r t h e b e n e fit o f h u m a n i t y a n d t h e e a rth 's b i o l o gic a l d iv e rs i t y.

Susan Krause
President
Four Harbors Audubon Society
St. James, NY

June Summer
President
Genesee Valley Audubon Society
Rochester, NY

Karen D'Alessandri
President
Rockland Audubon Society
Rockland, NY

Anne Swaim
Executive Director
Saw Mill River Audubon Society
Chappaqua, NY

Pat Fitzgerald
President
Southern Adirondack Audubon Society
Queensbury, NY

Alan R. Dolan
President
Canton Audubon Society
Canton, OH

Barbara Revard
President
Columbus Audubon Society
Columbus, OH

Martha Evans
Secretary
Indian Nations Audubon Society
Vian, OK

Susan S. Walker
President
Payne County Audubon Society
Stillwater, OK

Barbara Taylor
President
Cape Arago Audubon Society
Coos Bay, OR

Maeve Sowles
President
Lane County Audubon Society
Eugene, OR

Molly Russell
President
Klamath Basin Audubon Society
Klamath Falls, OR

Linda Kreisman
President
Rogue Valley Audubon Society
Medford, OR

Diana Wales
President
Umpqua Valley Audubon Society
Roseburg, OR

Ann Vileisis
President
Kalmiopsis Audubon Society
Port Orford, OR

Peter G. Saenger
President
Lehigh Valley Audubon Society
Emmaus, PA
Gary L. Metzger  
President  
**Lycoming Audubon Society**  
Williamsport, PA

Jim Fiorentino  
President  
**Quittapahilla Audubon Society**  
Palmyra, PA

Leigh Altadonna  
President  
**Wyncote Audubon Society**  
Wyncote, PA

Thomas L. Smith  
President  
**York Audubon Society**  
York, PA

Rick Riebesell  
President  
**Hilton Head Island Audubon Society**  
Hilton Head Island, SC

Nancy Hilding  
President  
**Prairie Hills Audubon Society**  
Black Hawk, SD

William Franks  
President  
**Cumberland-Harpeth Audubon Society**  
Nashville, TN

John Bellmon  
President  
**Utah Audubon Council**  
Salt Lake City, UT

---

Richard Mueller  
Conservation Chair  
**Bridgerland Audubon Society**  
Logan, UT

Heather Dove  
President  
**Great Salt Lake Audubon Society**  
Salt Lake City, UT

Keith A. Davis  
Vice President & Acting President  
**Red Cliffs Audubon Society**  
St. George, UT

Katie McVey  
President  
**Wasatch Audubon Society**  
Ogden, UT

Carl Kikuchi  
President  
**Audubon Society of Northern Virginia**  
Reston, VA

Tony Wood  
President  
**Cape Henry Audubon Society**  
Norfolk, VA

Lewis Barnett  
President  
**Richmond Audubon Society**  
Richmond, VA

Ronald Payne  
President  
**Otter Creek Audubon Society**  
Middlebury, VT

---

*Working to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth’s biological diversity.*
Work in g t o c on s e rve  a n d r e s t o re  n a tu ra l e c os ys te m s ,  foc u s in g on  b ird s ,  o th e r w ild life ,  a n d th e ir h a b i ta ts  f or th e  b e n e fit of h u m a n i ty a n d  th e  e a rth 's  b io lo gic a l d ive rs ity.

Rick Jahnke
President
Admiralty Audubon Society
Port Townsend, WA

Deb Nickerson
President
Black Hills Audubon Society
Olympia, WA

Mike Denny
President
Blue Mountain Audubon Society
Walla Walla, WA

Jim Herrin
President
Central Basin Audubon Society
Moses Lake, WA

Andrew McCormick
President
Eastside Audubon Society
Bellevue, WA

Arnie Martin
President
Grays Harbor Audubon Society
Hoquiam, WA

Janine Schutt
President
Kitsap Audubon Society
Bremerton, WA

Tom Gauron
President
Kittitas Audubon Society
Ellensburg, WA

Lori Nelson
President
Lower Columbia Basin Audubon Society
Richland, WA

Pam Borso
President
North Cascades Audubon Society
Custer, WA

Jeff Parsons
President
North Central Washington Audubon Society
Leavenworth, WA

Jim Gift
President
Olympic Peninsula Audubon Society
Sequim, WA

Katheleen Snyder
President
Pilchuck Audubon Society
Everett, WA

Dan Streiffert
President
Rainier Audubon Society
Kent, WA

Barbara Jensen
President
San Juan Islands Audubon Society
Friday Harbor, WA

Cynthia Wang
President
Seattle Audubon Society
Seattle, WA

Working to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity.
Philip Wright  
President  
**Skagit Audubon Society**  
Anacortes, WA

Fran Haywood  
President  
**Spokane Audubon Society**  
Spokane, WA

At Wang  
President  
**Tahoma Audubon Society**  
Tacoma, WA

Eric Bjorkman  
President  
**Vancouver Audubon Society**  
Vancouver, WA

Randall Smith  
President  
**Vashon-Maury Island Audubon**  
Vashon, WA

Anna Swartz  
President  
**Whidbey Audubon Society**  
Freeland, WA

George Exum  
President  
**Willapa Hills Audubon Society**  
Cathlamet, WA

Andy Stepniewski  
President  
**Yakima Valley Audubon Society**  
Wapato, WA

Dan Jackson  
President  
**Coulee Region Audubon Society**  
La Crosse, WI

Neil Howk  
President  
**Chequamegon Audubon Society**  
Washburn, WI

Diane Lembck  
President  
**Wisconsin Metro Audubon Society**  
Franklin, WI

Jackie Canterbury, Ph.D.  
President  
**Bighorn Audubon Society**  
Sheridan, WY

Barb Gorges  
President  
**Cheyenne–High Plains Audubon Society**  
Cheyenne, WY

Andrea Orabona  
Vice President  
**Red Desert Audubon Society**  
Lander, WY

CC: Mr. Neil Kornze, BLM Director  
Mr. Dan Ashe, USFWS Director

These Chapter leaders speak on behalf of 160 National Audubon Society Chapters from 37 states, which together represent 140,281 members.