



# Montana Fish, Wildlife & Parks

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David Galt, Executive Director  
Montana Petroleum Association, Inc.  
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Dear Mr. <sup>Dave</sup>~~Galt~~.

This letter is written in response to your letter of March 21 regarding comments on sage grouse status. Thank you for providing a copy of the Technical Comments from Taylor Environmental Consulting LLC.

As you are aware, there is a great deal of effort currently being expended by many agencies, organizations and individuals throughout the west to prepare and submit updated information regarding sage grouse. Montana Fish, Wildlife & Parks (FWP) is working closely with the Western Association of Fish and Wildlife Agencies (WAFWA) to prepare a detailed update to the *Sage Grouse Conservation Assessment* submitted in 2003 to the United States Fish and Wildlife Service (USFWS). The USFWS has requested this update from WAFWA as part of its reconsideration of sage grouse for listing under the Endangered Species Act. The USFWS has also requested that individual states submit comments believed to be relevant to sage grouse status in each state.

FWP is considering all information available at this time in the preparation of comments pertaining to sage grouse in general and specifically in Montana. That consideration includes the *Multi-State Best Science* document as well any other information currently available. FWP comments will ultimately reflect all of the information believed to be relevant to the issue.

FWP believes that the *Management Plan and Conservation Strategies for Sage Grouse in Montana* completed in 2005 charts an excellent course for a sustained future for sage grouse. The overall goal of the plan is to "Provide for the long-term conservation and enhancement of the sagebrush steppe/mixed grass prairie complex in Montana in a manner that supports sage grouse and a healthy diversity and abundance of wildlife species and human uses." Objectives include maintaining the distribution of and integrity of sagebrush steppe communities and maintaining the distribution of sage grouse populations within the mountain foothills mixed sagebrush and Wyoming big sagebrush-silver sagebrush ecotypes based on consistently applied monitoring protocol.


FWP believes Montana sage grouse populations are currently healthy, but will only remain so if management and conservation are practiced in an adaptive manner that recognizes the changing nature of the landscape. Therefore, updates to the Montana Plan will be necessary over time to respond to changing conditions.

Since the completion of the Montana plan, several factors have become a greater concern to the sustainability of sage grouse and everyone must recognize and address those factors. Those factors include: large-scale fires resulting from extended hot, dry conditions; conversion of native habitat to cropland; residential and industrial development; West Nile Virus; and mining and energy development. These factors may not be currently as significant in Montana as in other states, but they are on the horizon. The U. S. Fish and Wildlife Service (USFWS) must review the overall range of sage grouse in its listing determination, but has also stated it will consider various segments of the overall population. In other words, listing may be determined necessary in some segments and not in others.

If the USFWS review determines that sage grouse should be listed under Endangered Species Act, there will be significant impacts to many parties. FWP has attempted to be open and upfront with all parties that may be impacted by changes to the status of sage grouse and its habitat. Those communications have suggested mitigation measures and practices that should provide greater conservation of Montana's sage grouse population. FWP believes that imposing such mitigation now is the best defense against a listing, at least in Montana.

FWP stands willing to work with the Montana Petroleum Association, and/or individual petroleum producers, as well as other interested parties in conserving sage grouse in Montana. Please feel free to contact me if you would like to discuss this further.

Sincerely,



M. Jeff Hagener  
Director

c: Gene Terland, BLM State Director  
Mary Sexton, DNRC Director