



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

Honorable Ryan Zinke
Secretary, U.S. Department of the Interior
1849 C Street, N.W., Washington, D.C. 20240

20 July 2017

RE: Secretarial Order 3353 - Greater Sage-Grouse Conservation and Cooperation with Western States; need for science-based management approaches

Dear Secretary Zinke:

The Wildlife Society recognizes the importance of enhancing cooperation between state and federal partners in the management and conservation of the greater sage-grouse (*Centrocercus urophasianus*). Moreover, we appreciate your interest in critically evaluating sage-grouse conservation strategies and seeking innovative strategies for sage-grouse conservation that best support state efforts.

As a professional scientific society representing more than 10,000 professional wildlife biologists and managers throughout North America, we urge the Department to emphasize the role of scientifically defensible sage-steppe ecosystem management when working toward coordination of state and federal management efforts. State and federal efforts should focus on reducing or eliminating threats to the sage-steppe ecosystem through science-informed management practices that maintain or enhance the quality of sage-grouse habitat.

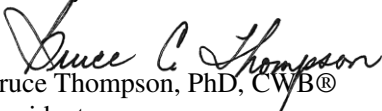
The sage-steppe ecosystem has been substantially altered by livestock grazing, disrupted fire regimes, exotic invasive species, and energy/exurban development, which have resulted in considerable loss and fragmentation of suitable habitat for the greater sage-grouse. In supporting the conservation of sage-grouse, state and federal practices should not focus on artificially increasing the number of individual sage-grouse, but rather on innovative strategies to improve the overall health and connectivity of the sage-steppe ecosystem. Such efforts will produce greater sage-grouse under natural conditions, and align greater sage-grouse populations with available habitat resources.

Practices such as captive breeding, as mentioned in Sec. 4(b)(v)(1) of Secretarial Order 3353, have no functional role in the science-based management of greater sage-grouse and could have detrimental effects on long-term viability of the species. As highlighted in a [letter by our Wyoming Chapter](#) in response to legislatively proposed captive rearing plans for greater sage-grouse in their state, using captive breeding to augment greater sage-grouse populations is not an approach currently supported by the scientific literature for this species, and comes with long-term risks of genetic implications, disease transmission, and impacts on behavior. Captive rearing is typically reserved for a final, intensive effort to save a species whose populations have shrunk to minimal levels – at this point, greater sage-grouse populations do not require such an intensive effort, and attempting captive rearing could put the population at greater risk and misdirect valuable effort from habitat conservation.

By providing collaborative solutions to the larger underlying issues affecting the status of greater sage-grouse populations, state and federal partners, while working with private landowners, can implement science-based management practices to promote functional landscapes that not only enhance greater sage-grouse conservation, but also support many other economically and ecologically significant wildlife species dependent on the sage-steppe ecosystem.

Thank you for considering the recommendations of wildlife professionals. Please contact Keith Norris, AWB®, Director of Wildlife Policy & Programs at keith.norris@wildlife.org or (301) 897-9770 x309 if you require further information or have any questions.

Sincerely,


Bruce Thompson, PhD, CWB®
President