



Northwest Office
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Date: March 11, 2021

To: Lisa Wood
SEPA/NEPA Coordinator, WDFW Habitat Program, Protection Division
P.O. Box 43200
Olympia, WA 98504

RE: DNS 21-006: UPLIST GREATER SAGE-GROUSE FROM A THREATENED SPECIES TO AN ENDANGERED SPECIES IN THE STATE OF WASHINGTON

Dear Ms. Wood and the Washington Department of Fish and Wildlife,

Thank you for the opportunity to provide comments on the proposal to uplist the Greater Sage-grouse from threatened to endangered status in Washington. We are in support of uplisting this species to endangered. The Northwest Program of Defenders of Wildlife (Defenders) provided comments in November 2020 in support of uplisting as detailed in the Washington Department of Fish and Wildlife's periodic status review of the species.

Defenders is a national non-profit conservation organization with nearly 2.2 million members and supporters. We are dedicated to the protection of native wild species in their natural communities. In Washington State, Defenders' more than 70,000 supporters recognize the sagebrush steppe as crucial for the survival of the greater sage-grouse and the numerous other species that rely on this critical habitat. As we have seen in recent years, habitat loss and destruction due to increasingly strengthened wildfires have taken a serious toll on Washington's population of greater sage-grouse.

The sagebrush steppe ecosystem of central and southeastern Washington is vital to the survival of numerous species. During the winter, greater sage-grouse rely almost entirely on sagebrush for their diet and congregate in large leks during mating season, using the sagebrush for protection and nesting. After the devastating fires in 2020, much of this critical habitat was destroyed and put the bird's population at even higher risk of extinction. In the draft periodic status review for the greater sage-grouse, it is stated that "habitat condition may no longer be adequate to long sustain a population." Further, the habitat between the four primary leks are disconnected and thus the populations cannot interbreed, creating genetic bottlenecks. Roadway construction, development, and agriculture have contributed greatly to this fragmentation. The Natural Resource Conservation Service has deemed habitat connectivity necessary to enable movement between viable shrub-steppe habitat, and to prevent genetic bottlenecks within isolated populations.

It is estimated that the greater sage-grouse population has now fallen below 1,000 individuals, less than 1/3 of the minimum viable population size. As we stated in our comment letter regarding the periodic status review, it is now even more crucial that the greater sage-grouse be listed as endangered under the Endangered Species Act. The Lincoln County population is almost certainly extinct, and the Joint Base Lewis-McChord Yakima Training Center population continues to decline to extinction. WDFW reports that the remaining Douglas County population will likely be reduced by 50%, bringing the total greater sage-grouse count down to less than 400 individuals in Washington. Without necessary protections and resources, we can soon expect this species to disappear from our state. Protections for the Greater Sage-grouse should include conservation policies and practices for sagebrush species to ensure suitable habitat for this bird and other native sagebrush fauna.

The periodic status review for the greater sage-grouse is thorough and effectively highlights the urgency of this situation. By uplisting to endangered status, the greater sage-grouse may see some recovery in certain parts of Washington due to the “prioritization of the conservation need and actions around greater sage-grouse” (WDFW 2021). Thank you again for allowing us the opportunity to provide comment and for deeply considering the extreme situation of this species and the need to provide stronger protections.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Gobush', with a long horizontal flourish extending to the right.

Kathleen S. Gobush, Ph.D.
Northwest Program Director