September 13, 2010

Marla Rae
Chair, Oregon Fish and Wildlife Commission
3406 Cherry Avenue, NE
Salem, Oregon 97303

Dear Chair Rae and Members of the Commission,

Thank you for the opportunity to share our comments regarding the Greater Sage-Grouse Conservation Assessment and Strategy for Oregon (Draft Plan Revision). We share the Oregon Department of Fish and Wildlife’s (ODFW) concern for the health of the greater sage-grouse and its habitat, and hope to work with the Agency to enhance species and habitat protection. Based on information reported in the Draft Plan Revision, it appears that the State’s 2005 Plan is having a positive impact on the species and its habitat. But while we support efforts to enhance species protection and habitat restoration, due to the following factors we cannot support the proposed changes to the State’s current sage-grouse protection plan:

- **The Draft Plan Revision Does Not Include Climate Change as an Important Threat to Wildlife and Habitat Throughout Oregon:** Oregon Department of Fish and Wildlife has embraced climate change as a critical challenge to wildlife and wild places. We are puzzled why this critical issue was not included in the list of potential threats to sage-grouse and sage-grouse habitat.

- **Narrow interpretation of ODFW’s Wildlife Policy Increases the Chances for Constituent Disagreement:** By not factoring all of the objectives of the Oregon Wildlife Policy, in our view the Agency is proposing a conservation plan without regard to the serious repercussions for landowners, the communities in which they live, and the economic development opportunities they need to sustain rural lifestyles.

- **Unbalanced input into the Draft Plan Revision Process:** We were told by ODFW staff that the Draft Plan Revisions contributors and editors were selected based largely on the group responsible for developing the 2005 Oregon Sage Grouse Conservation Plan. In our view, the failure to include other perspectives into the Draft Plan Revision’s drafting, results in a number of serious flaws.

- **Uncertain Program Funding Makes Implementation Improbable:** While the Draft Revision Plan does not include program implementation estimates, increasing conservation measures across such a large landscape inevitably costs money. Unfortunately, both state and federal habitat protection plans are suffering from the
malaise of the lingering economic recession. The Draft Revision Plan suggests no revenue sources to pay for the costs associated with program implementation.

We support ODFW’s efforts to enhance sage-grouse and sage-grouse habitat protection. We are committed to collaborative, multi-stakeholder, problem-solving oriented dialogue. We respectfully request that the Commissioners consider other approaches to reaching consensus on how to improve SGSB habitat, including the following:

- **BLM/OR process:** The State of Oregon and the Bureau of Land Management are engaged in a dialogue designed to better coordinate state and federal efforts to protect sage-grouse/sage-grouse habitat in Oregon, and to facilitate renewable energy siting on federal lands. Because this process involves a wider group of stakeholders, we would support using this venue to discuss the ODFW Draft Plan Revision.

- **Candidate Conservation Agreements:** Should Oregon counties consider negotiating CCAA, it would enable federal and state fish and wildlife officials to tailor landscape-scale approaches to responsible management of all threats to SGSB – not solely singling out renewable energy projects.

- **Direct Dialogue with ODFW:** Working together, we believe we can find better solutions to SGSB habitat protection efforts than proposed in the Draft Plan Revision. To make such a discussion successful, we recommend ODFW add representatives from the Oregon Association of Counties, members of Oregon’s environment and conservation community, and renewable energy companies, their biologists, and associations.

- **Federal Advisory Committee (FAC) guidelines:** These guidelines emphasize wind energy development using the best available science, landscape scale planning, and a decision making framework that uses “tiers” to identify levels of potential harm to sensitive species or habitats. We would like to explore with ODFW whether or not this approach offers landowners and community leaders a greater role in developing enhanced sage-grouse conservation plans that better reflect the individual nature of each affected community.

We respectfully request the opportunity to work with you and Agency officials to develop and implement stronger, more effective measures to enhance the sage-grouse and its habitat.

Respectfully,

Tom Chamberlain, President
Oregon AFL-CIO