

Gambling with Lesser Prairie Chicken Extinction

Prairie Chicken Advocates,

I am writing to let you know that you have until September 1, 2021, to comment on the U.S. Fish & Wildlife Service's (Service's) proposed rule to list lesser prairie-chickens under the Endangered Species Act. Lesser prairie-chickens, which occur in Kansas, Oklahoma, Colorado, Texas and New Mexico, are one of the most threatened prairie grouse species remaining in North America. And prairie ecosystems are the most threatened type of ecosystem on the continent.

Lesser prairie-chickens and prairies urgently need our help.

Please go to the link below and consider commenting and advocating for answers to key questions (see below) about how responsible agencies can do more to conserve this species and landscape.

<https://www.federalregister.gov/documents/2021/06/01/2021-11442/endangered-and-threatened-wildlife-and-plants-lesser-prairie-chicken-threatened-status-with-section>

For more information on the proposed rule, go here:

<https://www.fws.gov/southwest/es/LPC.html>

Below are some specific points the NAGP encourages you to make and questions you may want to ask of the Service. These are the official positions that the NAGP has taken and communicated to the Service.

- Commend the Service for a strong Species Status Assessment and proposed rule, and thank them for the opportunity to comment.
- Express support for the overall goals of the Western Association of Fish and Wildlife Agencies' (WAFWA's) Lesser Prairie-Chicken (LPC) Range-Wide Plan, but note that the mitigation framework included in the plan has failed to achieve its objectives.
- Suggest that conservation of lesser prairie-chickens will need the establishments of strategically-located large blocks of high quality habitat that have not been produced due to: 1) inadequate overall funding to implement enough conservation projects with individual landowners; 2) the spreading out projects throughout the range instead of focusing them in key areas among adjacent landowners; and 3) inadequate compensation levels to engage landowners in strategic locations in conservation projects..
- Request the Service clearly describe the differences and similarities between the 2013 ESA listing decision and this proposed rule, including trends in habitat loss.
- Ask the Service to describe the importance of long-term trends in habitat loss vs. short-term trends in factors such as annual precipitation when evaluating LPC population status.
- Suggest that effective conservation of LPC will require long-term conservation actions, including long-term conservation contracts with landowners rather than short term contracts which do not provide for continuing large blocks of high-quality habitat as a foundation for LPC populations
- Make the point that the main threat to LPC is habitat loss and fragmentation which will require habitat restoration as a primary focus of any mitigation program. Note that WAFWA's Mitigation Framework, which is focused on habitat enhancement on remaining lands after habitat is taken elsewhere, has not provided this needed restoration.. Advocate for a new approach to mitigation.
- Ask the Service to explicitly address the factors cited in the federal court decision in 2015 compelling the Service to delist LPC in 2015 and why these have now been shown to be invalid.

- Ranchers own most remaining LPC habitat, and are essential to LPC conservation and recovery. Grazing can have beneficial, neutral, or negative effects on LPC habitat, depending on location, timing, and practices implemented. Ask the Service to describe a practical approach to guiding grazing management on private lands that will help identify those grazing practices at a specific location that will provide high quality LPC habitat. Ask the Service to describe grazing management that would cause impacts to LPC habitat.
- Ask the Service to explain how they can facilitate strategic, focused implementation of recovery actions for LPC, including the use of voluntary federal programs on private land, such as Farm Bill programs. And ask how you can help and stay involved in supporting recovery of lesser prairie chickens.

Finally, please contact your Congressional representatives and state wildlife agency and ask them to support conserving lesser prairie-chickens and the southern Great Plains prairies.

Ted Koch
Executive Director
North American Grouse Partnership