



Bringing back the birds

November 16, 2016

Gary Frazer
Assistant Director
Ecological Services
U.S. Fish and Wildlife Service

Dear Assistant Director Frazer,

American Bird Conservancy (ABC) thanks the Service for the ongoing dialogue regarding the protection and recovery of endangered birds. ABC appreciates the progress to date to bring back birds on the brink of extinction as revealed in our [ESA recovery report](#) and seeks to build on that success.

We wish to inform you that in the near future, ABC will petition the Service through the Department of the Interior to list the Oregon Vesper Sparrow (*Pooecetes gramineus affinis*) as threatened or endangered under the ESA due to several factors including small population size, significant population declines, breeding and wintering range contractions and many local extirpations, and ongoing habitat loss and degradation. A notification of this pending petition has been sent to the affected states, and several Service staff within Region 1 have been made aware through a presentation and personal conversations.

We have reviewed the Service's national listing work plan for ESA status reviews and have several comments to offer. We appreciate that the Service will undertake a voluntary status review of the Lesser Prairie-Chicken in Fiscal Year 2017 (FY17), and ABC supports the proposed uplisting of the Northern Spotted Owl to endangered status and have offered the Service [recommendations](#) to help reverse its current decline.

We urge that the Service undertake a voluntary status review in FY17 of the Eastern Bewick's Wren which has largely disappeared from its historic range. In regard to the proposed FY17 listing reviews of two Black-backed Woodpecker population segments (Black Hills, Cascades), please ensure that forest habitat with an adequate component of snags will be provided

Reviews are scheduled for the Black Rail in FY18 and the [California Spotted Owl](#) in FY19; however, indications are that these populations are in need of immediate protective measures to stem recent declines. Please initiate reviews in FY17.

Missing from the list was the Columbia Basin distinct population segment of the Greater Sage-Grouse. Washington's Department of Fish and Wildlife indicates that the grouse population in the state has

dropped from 1,000 to 750 birds due to drought and poor habitat conditions. While ABC supported the not-warranted finding for Greater Sage-Grouse, we disagree with the decision to end distinct segment status for the Columbia Basin population, which is the only remnant of this species in a significant portion of the grouse's historic range.

In addition, we recommend that the agency initiate a voluntary uplisting of the threatened Marbled Murrelet to endangered status. Washington State's murrelet population is in steep decline, and the species' habitat in Oregon is threatened by proposed state land sales. The new federal management plan for BLM lands in Oregon will reduce protective nest surveys, increase habitat fragmentation, and is therefore likely to increase murrelet nest predation.

[Washington State's Department of Fish and Wildlife](#) is recommending the murrelet be [uplisted to Endangered](#) from its current Threatened status and conservation groups have petitioned the State of Oregon to do the same. We urge the Service to encourage Washington's Department of Fish and Wildlife to complete a Marbled Murrelet Conservation Plan, that is now eighteen years overdue, and to support the State's proposed uplisting to Endangered status. Also please ask Oregon Governor Kate Brown to cancel the proposed sale of the Elliot State Forest which contains important murrelet habitat.

Finally, as a follow up on our ESA recovery report, ABC is developing a detailed funding recommendation to Congress to boost ESA recovery spending, particularly for birds in the State of Hawaii where a number of species are rapidly heading towards extinction. We urge you to consider adding the Kaua'i 'Amakihi and 'Anianiau to the listing workplan. [Both species have declined over 90%](#), and both could become extinct before the next 7 year workplan is issued. We would be interested in meeting with the appropriate staff to discuss the Service's funding needs in this regard.

Thank you for considering these requests. I can be contacted at sholmer@abcbirds.org to respond to this meeting request.

Sincerely,



Steve Holmer
Vice President of Policy
American Bird Conservancy