



BUILDING A STRONGER L.A.

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January 29, 2024

Ms. Martha Williams  
U.S. Fish and Wildlife Service  
1849 C Street, NW, Room 3331  
Washington, DC 20240-0001

Dear Ms. Williams:

Subject: Los Angeles Department of Water and Power Continuing Commitment to Implement Conservation Actions for the Bi-State Distinct Population Segment of the Greater Sage-grouse.

The purpose of this letter is to reaffirm the Los Angeles Department of Water and Power's (LADWP) commitment to continue implementing conservation actions in support of maintaining and improving habitat and species viability for the for the Bi-State Distinct Population Segment (DPS) of the Greater Sage-Grouse (*Centrocercus urophasianus*). Furthermore, as part of the process to update the highly effective Bi-State Sage-Grouse conservation partnership (Bi-State Partnership) 10-Year Action Plan (Plan), LADWP has also renewed its membership and commitment to coordinated interagency conservation of the species through 2034. As a pledge of commitment to the Bi-State Partnership and the Plan, each partnering agency has agreed to draft a letter to the United States Fish and Wildlife Service (USFWS) renewing their acknowledgement of responsibility and dedication to continued multi-jurisdictional conservation of the Greater Sage-Grouse.

Although the Bi-State Sage-Grouse (BSSG) DPS is not presently listed under the Endangered Species Act (ESA), there has been extensive stakeholder coordination created through the development of the Bi-State Partnership that has resulted in subsequent positive response in conservation planning throughout the range of the species. The Bi-State Partnership is comprised of a collaborative, multi-jurisdictional group of diverse stakeholders to conserve the BSSG DPS. Partners include the USFWS, the U.S. Geological Survey (USGS), the Bureau of Land Management (BLM), U.S. Forest Service (USFS), Natural Resource Conservation Service (NRCS), LADWP, state and local governments from California and Nevada, non-governmental organizations (NGO's), Tribes, agricultural producers, and interested citizens. The key components of this multi-tiered conservation partnership include: 1) The Local Area Working Group (LAWG), which serves as a foundation of engaged stakeholders; 2) The Technical Advisory Committee (TAC), which guides a science-based, adaptive strategy for BSSG conservation; 3) The Executive Oversight Committee (EOC), which ensures a coordinated interagency approach and; 4) The Bi-State Tribal Natural Resources

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Committee (BTNRC), which provides a forum for tribal members and representatives to address concerns and advocate for sound management of natural and cultural resources including cultural values. Through this partnership, the BSSG has been the focus of sustained collaborative efforts through the implementation of the Bi-State Action Plan which has served as a roadmap for the conservation of BSSG in the Bi-State region for the last 10 years. Summaries of actions and accomplishments by this group since 2012 can be referenced at <https://www.bistatesagegrouse.com/general/page/annual-implementation-reports>.

In addition, LADWP has been committed to the conservation of the BSSG DPS in Long Valley for over 25 years. LADWP owns and manages approximately 314,000 acres in Mono and Inyo Counties, California. Of these, approximately 37,991 acres provide potential year-round habitat for the BSSG within the Bodie Hills and South Mono Population Management Units (PMU). In the 1990's, LADWP constructed riparian fencing along the Upper Owens River, Convict Creek, McGee Creek, and Mammoth/Hot Creek to reduce grazing pressure in sensitive riparian areas. At this time, fencing in proximity to critical Lek areas and BSSG brood rearing habitat was designed and constructed to be laid down during the breeding season to eliminate bird strike. Subsequent grazing management plans developed and implemented in the 2000's incorporated rotational strategies that avoided BSSG breeding areas in the spring months and set grazing utilization standards to sustainable levels compatible with maintaining multiple land uses.

In 2013, LADWP adopted a Conservation Strategy for managing BSSG habitat on their deeded property in Mono County, California. This approach was codified with the USFWS in a Memorandum of Understanding (MOU) in 2014, and was incorporated and implemented into LADWP's management activities since. In 2019, LADWP wrote a Commitment Letter (June 18, 2019) to the USFWS reiterating their intention to continue managing the habitat in ways that benefit BSSG. In December 2020, the LADWP submitted to the USFWS an Adaptive Management Plan (AMP) titled: *Adaptive Management Plan for Bi-State Sage-Grouse (BSSG) Brood-Rearing Habitat on Los Angeles Department of Water and Power Lands in Long Valley*. This plan, developed collaboratively with the USFWS, outlined land management principles and protocols designed to support critical habitat for the BSSG. The AMP reiterated LADWP's ongoing commitment to BSSG habitat protection and enhancement and augments the 2014 conservation strategy by adding and defining further BSSG conservation actions incorporated into LADWP operational plans moving forward. The AMP also brought in additional collaborators including the California Department of Fish and Wildlife (CDFW), LADWP ranch lessees, the Bi-State Partnership, Mono County and the Eastern Sierra Audubon Society and set a reoccurring meeting schedule to review AMP annual reports and discuss adaptive management options if needed. In addition,

LADWP is an active participant in annual multi agency lek monitoring coordinated by the CDFW. This data is essential to understanding population number dynamics by lek, PMU, and population overall. LADWP has also worked with the USFWS for many years to develop a low effect, habitat-based Habitat Conservation Plan (HCP) to protect sensitive species (including the BSSG) that occur on City lands in Inyo and Mono Counties. The HCP has been noticed in the Federal Register, is under USFWS' final review, and will protect habitat for BSSG while allowing the continuation of LADWP's operations, maintenance, and management practices.

From 2017 to present, LADWP has partnered with the USGS to conduct a translocation program to restore a population of sage-grouse in Parker Meadows subpopulation located within the South Mono PMU. As a result of this work, multiple successful relocation methodologies have been developed and continue to evolve. In addition, population numbers at Parker Meadows have stabilized and in recent years have begun to increase with minimal impacts to source populations.

On February 2, 2021, in further support of Bi-State DPS conservation, the LADWP Board of Commissioners approved a two-year work plan and \$361,000 budget for USGS field monitoring to inform management actions for BSSG on LADWP lands in Mono County. At that time, LADWP had been working with the USGS on the conservation of BSSG on LADWP lands in the Bi-State region of California and Nevada for over 10 years. In the work plan, USGS identified eight tasks aimed at continuing research and addressing immediate threats to sage grouse in Long Valley that could assist LADWP in managing resources for sage grouse. Tasks included: 1) Conduct extensive field monitoring of Long Valley sage-grouse using radio and GPS/GSM telemetry, especially during nesting and brood rearing stages, to continue long-term measurements of population vital rates, macro-micro habitat selection patterns, and spatial use; 2) Evaluate raven nest success and changes in incubation behavior as a function of egg-oiling using cameras on raven nests; 3) Quantify differences in raven predation rates of sage-grouse nests as a function of raven hatch success using cameras on sage-grouse nests; 4) Continue assessment of importance of mesic resources, including irrigated pastures, on space use and survival of sage-grouse broods; 5) Further investigate subsequent changes in sage-grouse population growth using integrated population models and data collected in Long Valley and throughout the Bi-State; 6) Continue translocation efforts as means of bolstering persistence probability of sage-grouse at Parker Meadows, with light monitoring thereafter; 7) Quantify differences in habitat utilization, movements, and genetics among the augmented and source populations; 8) Investigate changes in augmented and source population growth, and overall impact on the Bi-State DPS using integrated population models.

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Rangeland management and conservation strategies developed as a result of LADWP's ongoing commitment to the protection of BSSG habitat has created an environment supporting the second largest subpopulation, in numbers of sage-grouse, in the Bi-State area. The LADWP commits to continued positive engagement with USGS sage-grouse research as well as the Bi-State Partnership as a whole. Furthermore, LADWP attests that the multijurisdictional stakeholders in the Bi-State Partnership remain collaborative and active toward achieving sustainable populations and habitats for the Bi-State DPS.

In summary, there have been significant gains toward BSSG conservation in the Bodie Hills and South Mono PMUs without listing the species as threatened or endangered under the ESA. Stakeholder collaboration within the Bi-State Partnership has resulted in numerous accomplishments throughout the BSSG area and LADWP's land management strategies currently in place continue to protect and enhance sage-grouse habitat in the Eastern Sierra. With this letter we wish to clearly indicate our commitment to conservation of the species and the habitat.

LADWP will continue to maintain close relationships with your staff and our partners to prioritize funding where biological benefits are maximized. If you have any questions or concerns, please contact Ms. Lori Dermody, Environmental Affairs Officer. She may be reached at (760) 873-0408 or by email at [Lori.Dermody@ladwp.com](mailto:Lori.Dermody@ladwp.com).

Sincerely,

*Eric Tillemans FOR ADAM PEREZ*

Adam Perez  
Manager of Aqueduct

RT:fj

c: Mr. Justin Barrett, USFWS  
Mr. Steve Abel, USFWS  
Mr. Mark Lacey, Lacey Livestock  
Ms. Tracy Misiewicz, Bi-State  
Ms. Lori Dermody