



COLORADO

Parks and Wildlife

Department of Natural Resources

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March 18, 2026

VIA REGULATIONS.GOV
Attn: FWS-R2-ES-2025-1661
U.S. Fish and Wildlife Service
MS: PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

**RE: Status Review for the Lesser Prairie-Chicken 91 Fed. Reg. 9547 Feb. 26, 2026
(FWS-R2-ES-2025-1661)**

Dear Clay Nichols,

Colorado Parks and Wildlife (CPW) submits these comments in response to notice that the U.S. Fish and Wildlife Service (Service) is initiating a new 12-month petition finding process for the lesser prairie-chicken (LPC) under the Endangered Species Act of 1973. We appreciate the ongoing commitment of the Service to communicate and provide information to state wildlife agencies. We also appreciate the continued efforts by the Service to engage with the five-state LPC Interstate Working Group (IWG) as well as Service Leadership communication to CPW Leadership. CPW is participating on the technical team reviewing and updating the Lesser Prairie-Chicken Species Status Assessment (SSA) and will continue to provide information related to the LPC throughout that process.

In 2022, the Service published a Lesser Prairie-Chicken SSA, which used the best available science to document the substantial and protracted decline in the distribution and abundance of the LPC throughout its range due to extensive habitat loss and fragmentation. Future conditions modeling in the 2022 SSA predicted that habitat loss and fragmentation would outpace conservation efforts in nearly all scenarios in all four ecoregions in which LPC remain (USFWS 2022). The majority of LPC in Colorado are located within the Sand Sagebrush Ecoregion, spanning southeast Colorado, southwest Kansas, and northwest Oklahoma. Unfortunately, now in 2026, current information from Colorado documents



Laura Clellan, Director, Colorado Parks and Wildlife

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continued habitat loss, additional fragmentation, and fewer birds than in 2022. The LPC population in southeast Colorado is perilously low. Recent CPW lek counts documented three-year averages of 71 (2022-2024) and 76 (2023-2025) males in the state. Population estimates for this entire ecoregion are also extremely low, with the most recent aerial surveys suggesting a three-year average of fewer than 1,000 birds (2020-2022), with high levels of uncertainty.

CPW has a long history and deep commitment to LPC conservation. Despite decades of collaborative management between CPW, private landowners, federal agencies, and conservation partners, the LPC population in southeast Colorado continues to decline. These conservation efforts—and the LPC—would benefit from regulatory mechanisms that provide added incentive to assess and mitigate the impacts of potential habitat-altering activities. Successful LPC conservation and recovery requires long-term land conservation and management compatible with LPC habitat requirements. Mitigation banking is an important tool that can provide both durable conservation and guaranteed LPC-focused management. CPW has been working with mitigation banking interests to target efforts in an area we and partners have designated as an Ark River Sand Sage Generational Grassland, which straddles the Colorado/Kansas state line and includes >75% of LPC documented in the ecoregion. The constantly shifting federal status of the species has undermined progress toward working with private landowners and mitigation banking interests to incentivize durable LPC-focused conservation in the area.

CPW reiterates our long-term mission to work to conserve LPC and LPC habitats within Colorado and across the range and commits to continue to provide technical assistance through participation in the five-state LPC IWG and on the LPC SSA technical team. We encourage the Service to heavily lean on the expertise and judgement of State collaborators in the upcoming SSA. We also encourage the Service to proceed on a timeline that allows this revised SSA to utilize the best available information and maps that may currently be in draft form. We appreciate the Service's coordination efforts to date and look forward to collaborative efforts to conserve and restore LPC habitat in the future.

Sincerely,



Laura Clellan
Director, Colorado Parks and Wildlife

Cc: Reid DeWalt, Deputy Director, Colorado Parks and Wildlife